



Accommodating Special Diets in School Nutrition Programs



Revised March 2020

**Connecticut State Department of Education
Bureau of Health/Nutrition, Family Services and Adult Education
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Contents

About This Guide.....	v
CSDE Contact Information	vi
Abbreviations and Acronyms	vii
1 — Overview	1
Nondiscrimination Legislation.....	2
Federal legislation	2
State legislation.....	3
Requirements for Meal Modifications	5
Children with disabilities.....	5
Children without disabilities.....	6
Children eligible for free and reduced-price meals	7
Table 1. Determining if meal modifications are required in school nutrition programs	8
Meal Patterns and Dietary Specifications	9
Meal Reimbursement and Cost.....	10
Price of meals	10
Allowable costs.....	11
Procedures for Meal Modifications	11
Team approach.....	11
Communicating with parents and guardians.....	11
Communicating with school food service personnel	13
Summary of School Food Service Responsibilities.....	14
Meal pattern substitutions.	14
Accessibility	14
Cooperation	15

2 — Modifications for Children with Disabilities	17
Definition of Disability.	18
Section 504 of the Rehabilitation Act and the ADA	18
IDEA Act of 2004	20
USDA’s nondiscrimination regulations	20
Determining What Constitutes a Disability	22
Section 504 considerations	23
IDEA considerations	24
Other considerations	25
Medical Statement Requirements	26
CSDE’s medical statement form	27
Medical information in IEP or Section 504 Plan	27
Handling missing information	28
Declining a request	28
Stopping a request	29
Storage of medical statements	29
Updates of medical statements	29
Conflicting information	30
Episodic Disabilities	30
Temporary Disabilities	31
Same Meal	31
Specific Brands of Food	31
Number of Alternate Meals	32
Different Portion Sizes	33
Texture Modifications	33
Tube Feedings	35
Administering Feedings	35
Meal Services outside the USDA’s School Meal Programs	36
Special foods or nutrition supplements	36
Table 2. Criteria requiring special foods for children with disabilities	37
A La Carte Foods	38
Offer versus Serve	38



Nutrition Information	39
Nutrition information for USDA Foods.....	40
Carbohydrate Counts.....	40
Food Allergy	41
Food allergy resources.....	42
Food Intolerance.....	43
Gluten Sensitivity	44
Celiac Disease	44
Table 3. Examples of foods to avoid and allow with celiac disease	45
Autism.....	46
Example of aversion to fruits and vegetables.....	46
Example of preference for heated food	47
Food Preference versus Disability.....	48
Milk Substitutes for Disabilities	49
Fat content.....	49
Nondairy milk substitutes.....	50
Identifying Students.....	51
Acceptable practices	51
Appropriate Eating Areas	53
Banning Foods	54
3 — Modifications for Children without Disabilities	55
Milk Substitutes without Disabilities.....	56
Required documentation for milk substitutes	56
Lactose-reduced and lactose-free milk.....	57
Acceptable nondairy beverages for milk substitutes.....	58
Table 4. USDA’s nutrition standards for milk substitutes.....	59
Identifying acceptable milk substitutes	59
Variety of milk substitutes	60
Availability of milk substitutes	60
A la carte sales of milk substitutes.....	60
Other beverages	61
Table 5. Milk substitutes for children without disabilities in grades K-12 in the NSLP, SBP, and ASP	62

Table 6. Milk substitutes for ages 2-4 without disabilities in the NSLP, SBP, and ASP	64
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4 — Modifications for Other Reasons	67
Religious Reasons.....	67
Jewish sponsors.....	67
Seventh-day Adventist sponsors.....	69
Vegetarians	70
Food Preferences	71
Procured Meals.....	71
Family-provided Foods	72
5 — Policies and Procedures.....	75
Procedural Safeguards	75
Food Allergy Management Plan	76
Policies for Meal Modifications	77
Standard Operating Procedures (SOPs)	76
Strategies for policy development	79
Staff Training.....	80
6 — Resources	83
CSDE Forms and Handouts	83
CSDE Guides	84
CSDE Resource Lists	85
Nondiscrimination Legislation.....	86
Child Nutrition Programs	87
Regulations and Policy	90
Glossary	93

About This Guide

The Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in School Nutrition Programs*, contains information and guidance on the requirements for modifying meals for children with special dietary needs in the U.S. Department of Agriculture's (USDA) school nutrition programs, based on the federal nondiscrimination laws, USDA regulations, and Connecticut laws. The USDA's school nutrition programs include the:

- National School Lunch Program (NSLP);
- Afterschool Snack Program (ASP) of the NSLP;
- School Breakfast Program (SBP);
- Seamless Summer Option (SSO) of the NSLP;
- Special Milk Program (SMP);
- Fresh Fruit and Vegetable Program (FFVP); and
- Child and Adult Care Food Program (CACFP) At-risk Supper Program implemented in schools.

Due to the complicated nature of some issues regarding feeding children with special dietary needs, school food authorities (SFAs) are encouraged to contact the CSDE for assistance. For questions regarding meal modifications, please contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education. For a list of the CSDE's school nutrition programs staff, see "[CSDE Contact Information](#)" on the next page.

Each section of this guide contains links to other sections when appropriate, and to websites with relevant information and resources. These resources can be accessed by clicking on the blue text throughout the guide. The mention of trade names, commercial products, and organizations does not imply approval or endorsement by the CSDE or the USDA.

The contents of this guide are subject to change. The CSDE will update this guide as the USDA issues additional policies and guidance. Please check the CSDE's [Special Diets in School Nutrition Programs](#) webpage for the most current version. For more information, contact Susan S. Fiore, M.S., R.D., Nutrition Education Coordinator, at susan.fiore@ct.gov or 860-807-2075.

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CSDE Contact Information


For questions regarding the information in this guide, please contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education.

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For information on the Afterschool Snack Program (ASP), Special Milk Program (SMP), Child and Adult Care Food Program (CACFP), Fresh Fruit and Vegetable Program (FFVP), and Summer Food Service Program (SFSP), visit the CSDE's [Child Nutrition Programs](#) webpage.

Abbreviations and Acronyms

ADA	Americans with Disabilities Act
APP	alternate protein product
APRN	advanced practice registered nurse
CDC	Centers for Disease Control and Prevention
CFR	Code of Federal Regulations
CHR	Cumulative Health Record
CNP	Child Nutrition Programs
CSDE	Connecticut State Department of Education
DPH	Connecticut State Department of Public Health
ECP	Emergency Care Plan
FARE	Food Allergy Research & Education
FDA	Food and Drug Administration
FERPA	Family Educational Rights and Privacy Act
FNS	Food and Nutrition Service, U.S. Department of Agriculture
HHFKA	Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296)
ICN	Institute of Child Nutrition (formerly National Food Service Management Institute)
IEP	Individualized Education Program
IDEA	Individuals with Disabilities Education Act
IHCP	Individualized Health Care Plan
LEA	local educational agency



NSLP	National School Lunch Program
OHI	other health impaired
PHC	Public Health Code
PPT	Planning and Placement Team
PKU	phenylketonuria
QFO	qualified food operator
RCCI	residential child care institution
RD	registered dietitian
RDN	registered dietitian nutritionist
SBP	School Breakfast Program
SFA	school food authority
SFSP	Summer Food Service Program
SOP	standard operating procedure
SSO	Seamless Summer Option of the NSLP
USDA	U.S. Department of Agriculture

1 — Overview

The school food authority (SFA) for each school and institution that participates in the U.S. Department of Agriculture’s (USDA) school nutrition programs must comply with the federal requirements for meal modifications for children with special dietary needs. The USDA’s school nutrition programs include the:

- National School Lunch Program (NSLP);
- School Breakfast Program (SBP);
- Afterschool Snack Program (ASP) of the NSLP;
- Seamless Summer Option (SSO) of the NSLP;
- Special Milk Program (SMP);
- Fresh Fruit and Vegetable Program (FFVP); and
- Child and Adult Care Food Program (CACFP)
At-risk Supper Program implemented in schools.



The requirements for meal modifications are different for children with and without disabilities. This guide summarizes the federal nondiscrimination laws and the USDA’s regulations and policies that determine these requirements. It includes current USDA guidance on the requirements for meal modifications in the NSLP, SBP, ASP, SSO, SMP, FFVP, and CACFP At-risk Supper Program, as indicated in:

- [USDA Memo SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers \(Q&As\)](#);
- [USDA Memo SP 59-2016: Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs](#); and
- the USDA’s guide, [Accommodating Children with Disabilities in the School Meal Programs: Guidance for School Food Service Professionals](#).

Due to the complicated nature of some issues regarding feeding children with special dietary needs, SFAs are encouraged to contact the CSDE for assistance. For a list of the CSDE’s school nutrition programs staff, see “[CSDE Contact Information](#)” at the beginning of this guide.



Nondiscrimination Legislation

Federal nondiscrimination laws and regulations contain provisions that require schools and institutions to make reasonable meal modifications on a case-by-case basis for children whose disability restricts their diet. These laws include:

- [Section 504 of the Rehabilitation Act of 1973](#) (Section 504);
- the [Individuals with Disabilities Education Act \(IDEA\)](#);
- the [Americans with Disabilities Act \(ADA\)](#) of 1990, including changes made by the [ADA Amendments Act of 2008](#); and
- the USDA's nondiscrimination regulations ([7 CFR 15b](#)).

The USDA's regulations for school nutrition programs ([7 CFR 210.10\(m\)](#) and [7 CFR 220.8\(m\)](#)) require reasonable meal modifications for children whose disability restricts their diet, based on a written medical statement signed by a recognized medical authority. Requests for a reasonable meal modification must be related to the child's disabling condition. For more information, see [section 2](#).

Federal legislation

Section 504, the IDEA, the ADA, and the ADA Amendments Act are laws that protect individuals with disabilities from discrimination.

- Section 504 prohibits all programs and activities receiving federal financial assistance, including public schools, from discriminating against children with disabilities, as defined in the law. It requires each public agency to take steps to ensure children with disabilities have an equal opportunity to benefit from extracurricular services and activities, including meals.
- The IDEA is a federal grant program that provides financial assistance to states in the provision of special education and related services for eligible children.
- The ADA guarantees equal opportunity and access for individuals with disabilities in employment, public accommodations, transportation, state and local governments, and telecommunications.
- The ADA Amendments Act prohibits discrimination based on disability in the provision of state and local government services, including services provided by public schools, and prohibits discrimination based on disability by private entities offering public accommodations, including private schools. The ADA Amendments Act greatly expands the concept of who is disabled. It requires that a disability must be viewed more broadly to encompass more impairments that limit a major life activity and therefore require an accommodation.

- The USDA’s nondiscrimination regulations (7 CFR 15b.26(d)) prohibit discrimination against children with disabilities in any USDA program or activity. These regulations require recipients of federal financial assistance (such as school nutrition programs) to serve modified meals at no extra charge to participants whose disability restricts their diet.

A child whose disability restricts their diet may be protected from discrimination under the provisions of one or more of these laws.

Section 504 and the IDEA require that local educational agencies (LEAs) must provide education and related services, including medically prescribed meal substitutions, at no cost to parents or guardians. In appropriate situations, nutrition services may be specified as special education (specially designed instruction) or a related service (support services required to assist a child with a disability to benefit from special education).

A child with a disability under Section 504 or the IDEA may be entitled to receive medically prescribed meal substitutions as part of the child’s Section 504 plan or Individualized Education Program (IEP). If meal substitutions are included in the child’s Section 504 plan or IEP, the LEA must provide them at no cost to parents or guardians. For more information, see “[Section 504 Considerations](#)” and “[IDEA Considerations](#)” in section 2.

State legislation

The Connecticut General Statutes (C.G.S.) for public schools address requirements that apply to all children (with or without disabilities) in public schools, such as providing lunch periods (C.G.S. 10-221o) and developing a management plan for life-threatening food allergies (C.G.S. 10-212c).

- [Connecticut General Statutes Section 10-221o. Lunch Periods and Recess.](#) Each local and regional board of education shall require each school under its jurisdiction to (1) offer all full day students a daily lunch period of not less than twenty minutes, and (2) include in the regular school day for each student enrolled in grades kindergarten to five, inclusive, a period of physical exercise, except that a planning and placement team may develop a different schedule for a child requiring special education and related services in accordance with chapter 164 and the Individuals With Disabilities Education Act, 20 USC 1400 et seq., as amended from time to time. In the event of a conflict with this section and any provision of chapter 164, such other provision of chapter 164 shall be deemed controlling.

- *Connecticut General Statutes Section 10-212c. Life-threatening food allergies: Guidelines; District plans.* (a) Not later than January 1, 2006, the Department of Education, in conjunction with the Department of Public Health, shall develop and make available to each local and regional board of education guidelines for the management of students with life-threatening food allergies. The guidelines shall include, but need not be limited to: (1) education and training for school personnel on the management of students with life-threatening food allergies, including training related to the administration of medication with a cartridge injector pursuant to subsection (d) of section 10-212a, (2) procedures for responding to life-threatening allergic reactions to food, (3) a process for the development of individualized health care and food allergy action plans for every student with a life-threatening food allergy, and (4) protocols to prevent exposure to food allergens.

(b) Not later than July 1, 2006, each local and regional board of education shall implement a plan based on the guidelines developed pursuant to subsection (a) of this section for the management of students with life-threatening food allergies enrolled in the schools under its jurisdiction.

In response to C.G.S. Section 10-212c, the CSDE developed the publication, *Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools*. For more information, see “[Food Allergy Management Plan](#)” in section 5.

The C.G.S. also address numerous requirements regarding school health services. C.G.S. [Chapter 169](#), School Health and Sanitation, encompasses several statutes related to the provision of school health services within public schools in Connecticut. These statutes provide the framework for many school health policies for all children regarding health monitoring, screening, and the administration of medications.



Requirements for Meal Modifications

The USDA’s regulations for school nutrition programs require that all meals served to children must comply with the appropriate meal pattern for each program and grade group. For grades K-12 in the NSLP and SBP, the meal patterns also include weekly dietary specifications (nutrition standards). However, food substitutions and other reasonable modifications to the meal patterns may be necessary to meet the dietary needs of children who:

- qualify as having a disability under any of the federal nondiscrimination laws;
- are eligible for special education under the IDEA; or
- do not qualify as having a disability under any of the federal nondiscrimination laws, but have other special dietary needs.

Examples of possible modifications include food restrictions, substitutions, texture changes (e.g., pureed, ground, chopped, or thickened liquids), increased or decreased calories, and tube feedings. Modifications to the meal service may also involve ensuring that facilities and personnel are adequate to provide necessary services.

In certain situations, disability accommodations may require additional equipment; separate or designated storage or preparation areas, surfaces, or utensils; and specific staff training and expertise. For example, some children may require the physical assistance of an aide to consume their meal, while other children may need assistance tracking their dietary intake, such as tracking carbohydrate intake for children with diabetes.

[Table 1](#) helps SFAs determine when meal modifications are required. For an overview of the requirements for meal modifications, see the CSDE’s handout, [Summary of Requirements for Accommodating Special Diets in School Nutrition Programs](#).

Children with disabilities

The USDA’s nondiscrimination regulations ([7 CFR 15b](#)) and regulations for school nutrition programs ([7 CFR 210.10\(m\)](#) and [7 CFR 220.8\(m\)](#)) require that SFAs make reasonable modifications on a case-by-case basis for children whose disability restricts their diet, when a recognized medical authority certifies the need. “Case-by-case basis” means that the meal modifications are specific to the individual medical condition and dietary needs of each child. A recognized medical authority is a state-licensed healthcare professional authorized to write medical prescriptions under state law. This includes physicians, physician assistants, doctors of osteopathy, and advanced practice registered nurses.

The USDA defines a “reasonable modification” as a change or alteration in policies, practices, and/or procedures to accommodate a disability that ensures children with disabilities have

equal opportunity to participate in or benefit from a program. The general guideline in making accommodations is that children with disabilities must be able to participate in and receive benefits from programs that are available to children without disabilities.

Meal modifications must be related to the disability or limitations caused by the disability, and require a medical statement from a recognized medical authority. All disability considerations must be reviewed on a case-by-case basis, i.e., any meal modifications are specific to the individual medical condition and dietary needs of each child. For information on what constitutes a disability and the requirements for meal modifications, see [section 2](#).

Children without disabilities

The USDA's regulations for school nutrition programs ([7 CFR 210.10\(m\)](#) and [7 CFR 220.8\(m\)](#)) allow, but do not require, meal modifications for children whose dietary needs do not constitute a disability. Examples include meal modification requests related to:

- religious or moral convictions;
- general health concerns; and
- personal food preferences, such as a family's preference that their children eat a gluten-free diet or organic foods because they believe it is healthier.

SFAs may choose to make these optional accommodations on a case-by-case basis. However, modified meals and ASP snacks provided to children without disabilities must always comply with the appropriate meal pattern for each program and grade group. For children without disabilities, SFAs cannot claim reimbursement for meals and ASP snacks that do not meet the USDA's meal patterns, even with a medical statement signed by a recognized medical authority. **The USDA only allows deviations from the meal patterns for children whose disability restricts their diet, when a recognized medical authority certifies the need.**

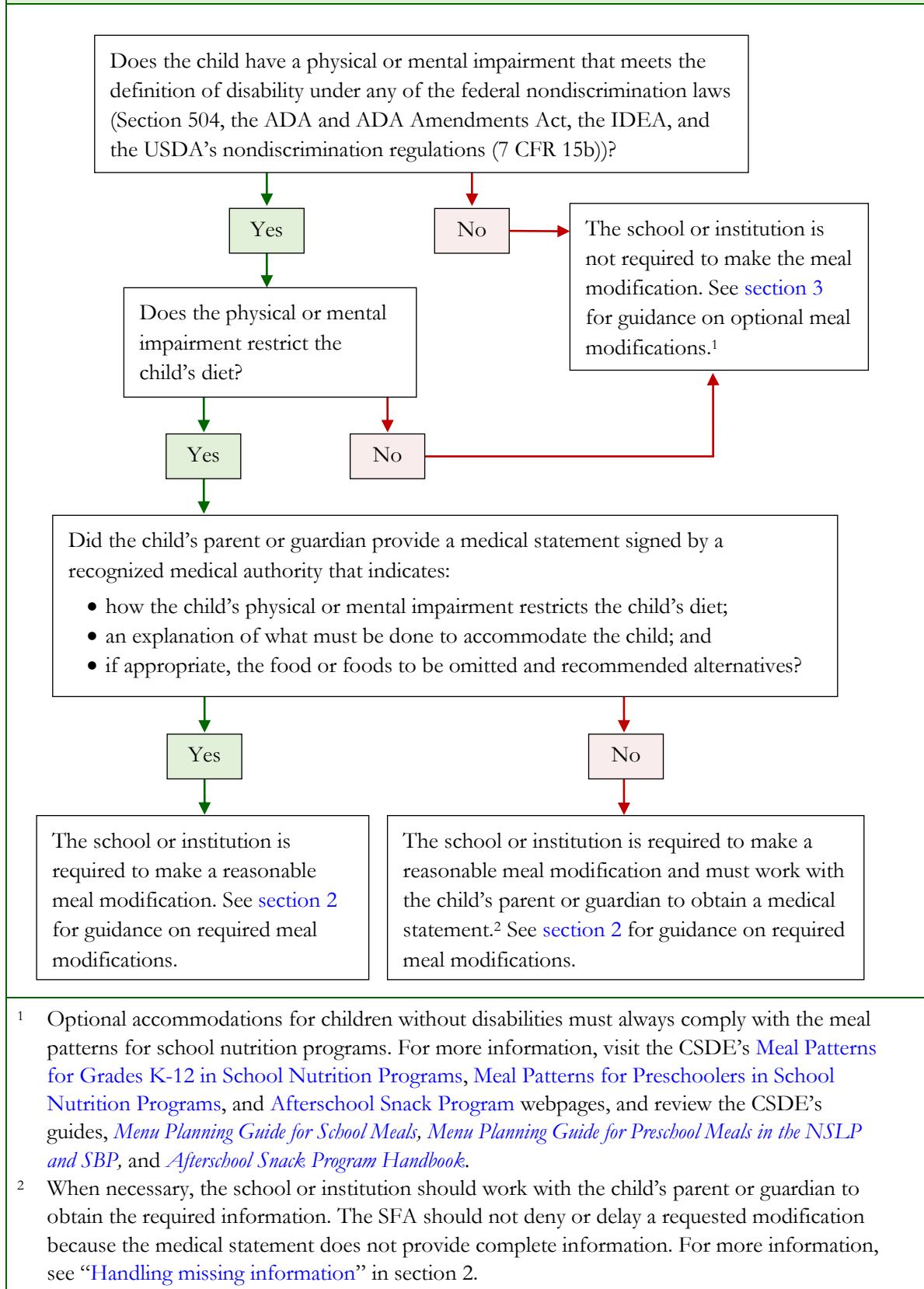
Meals and ASP snacks with optional modifications for children without disabilities are eligible for reimbursement, regardless of whether the SFA obtains a medical statement. However, the CSDE recommends obtaining a medical statement to ensure clear communication between the school food service program, school nurse, parents or guardians, medical professionals, and applicable school staff about the appropriate meal modifications for the child.

For resources on the meal patterns for school nutrition programs, see "[Meal Patterns and Dietary Specifications](#)" in this section. For guidance on optional meal modifications for children without disabilities, see [section 3](#).

Children eligible for free and reduced-price meals

The USDA's requirements for meal modifications apply to all children regardless of their eligibility for paid, free, or reduced-price meals. The requirements for meal modifications are based on whether a child is determined to have a disability that restricts their diet, not the child's eligibility for free or reduced-price meals. Meal modifications are not required for children who are eligible for free or reduced-price meals unless they have a disability that restricts their diet, and a recognized medical authority certifies the need.



Table 1. Determining if meal modifications are required in school nutrition programs

Meal Patterns and Dietary Specifications

The USDA's meal patterns do not apply to modified meals for children whose disability restricts their diet. However, meals that consist only of texture modifications, such as chopped, ground, or pureed foods, must meet the USDA's meal patterns.

Optional meal modifications for children whose dietary need does not constitute a disability must always meet the USDA's meal patterns. Meals and ASP snacks that do not meet the meal patterns are ineligible for reimbursement.

For grades K-12 in the NSLP and SBP, the USDA's meal patterns and weekly dietary specifications do not apply to modified meals for children whose disability restricts their diet. Meal modifications for children with disabilities are not included in the CSDE's nutrient analysis of school menus, when a nutrient analysis is required as part of the Administrative Review of school nutrition programs.

However, optional meal modifications for children without disabilities, and meals for children with disabilities that consist only of texture modifications or food substitutions from the same component, must meet the USDA's meal patterns and weekly dietary specifications. These meals are included in the CSDE's nutrient analysis of school menus, when a nutrient analysis is required as part of the Administrative Review of school nutrition programs.

For information on the USDA's meal patterns for school nutrition programs, see the resources below.

- **NSLP and SBP for grades K-12:** Visit the CSDE's [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage and review the CSDE's guide, *Menu Planning Guide for School Meals*.
- **ASP meal pattern for grades K-12:** Visit the CSDE's [Afterschool Snack Program](#) webpage and review the CSDE's guide, *Afterschool Snack Program Handbook*.
- **NSLP, SBP, and ASP meal patterns for preschoolers (ages 1-4):** Visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage and review the CSDE's guide, *Menu Planning Guide for Preschool Meals in the NSLP and SBP*.
- **CACFP At-risk Supper Program:** Visit the CSDE's [Meal Patterns for CACFP Child Care Programs](#) webpage and review the CSDE's guide, *Meal Pattern Requirements for CACFP Child Care Programs*.

Meal Reimbursement and Cost

SFAs claim modified meals at the same reimbursement rate as regular meals that meet the USDA's meal patterns. The USDA considers any additional costs for modified meals to be allowable food service program costs, but additional reimbursement is not available.

Price of meals

SFAs cannot charge more for modified meals served to children with or without disabilities. If a child qualifies for free or reduced-price meals, the charge for modified meals is also the same. The child must pay the regular meal price based on their eligibility for paid, reduced, or free meals.

Allowable costs

In most instances involving modified meals, the school food service account pays the cost of special food and food preparation equipment, and food service personnel will generally be responsible for providing the modified meal. For example, if a child must have a pureed meal, it is reasonable to expect the school food service account to purchase a blender or food processor, and to have the meal prepared by school food service personnel.

For special procedures such as tube feedings, proper administration generally requires the skills of specially trained personnel, such as nurses or special trained aides who regularly work with the child. If the child has an IEP, special education funds may cover special labor costs. Without an IEP, the LEA may charge these costs, as appropriate, in part to the food service account, the school district's general fund, or other funding sources.

A child with a disability may require the services of other personnel for assistance in feeding during a meal, e.g., the school nurse or a special aide who may assist in the child's feeding or other nutrition-related activity. The services of any personnel necessary to the meal service can be paid by the school food service account on a pro rata basis (proportionately). The food service account can only pay the amount of time that the person actually spends on activities related to the meal service. For example, if a school nurse spends one hour per day feeding a child with a special need, only that portion of the nurse's salary can be charged to the school food service account, not the entire salary. If the child is receiving special education and the child's IEP includes a nutrition or feeding component, special education funds may be available to the school to provide the required services for the child.

In most cases, SFAs can make meal modifications with little extra expense or involvement, and the nonprofit school food service account can usually cover any additional expenses involved in making the modification. When the nonprofit school food service account is not

a viable option, the cost of modifications may be offset by school district's general fund or, if specified in the child's IEP, special education funds.

The overall responsibility for accommodating children with disabilities rests with the LEA, not the SFA. The LEA's administration is responsible for allocating the costs of meal modifications for children with disabilities and deciding which personnel will work with individual children.

Procedures for Meal Modifications

The process of providing modified meals for children with disabilities should be as inclusive as possible. It is essential that school food service personnel work with the parent or guardian to ensure the child receives a safe meal, and has an equal opportunity to participate in the school nutrition programs.

Team approach

The USDA strongly encourages LEAs to develop a Section 504 team to discuss best practices and develop a more holistic plan to create a safe learning environment for all children. The most effective team will include school food service personnel, school administrators, school medical personnel, parents or guardians, children (when age appropriate), and other school officials with relevant experience, such as school dietitians.

Using a team approach ensures that information is shared consistently throughout the school environment and will help to protect children in situations where food is served outside the cafeteria, such as during classroom parties. Additionally, involving parents or guardians early in the process allows school employees to develop a rapport with the family, which helps to prevent any miscommunication or misunderstanding about their child's needs.

Communicating with parents and guardians

Ongoing communication between the LEA and parents/guardians is essential to ensure that meal modifications meet each child's individual dietary needs. The CSDE encourages LEAs to develop procedures for regularly communicating with parents and guardians regarding meal modifications for children. Topics to communicate include:

- the LEA's policy and standard operating procedures (SOPs) for managing meal modifications for children whose disability restricts their diet (see "[Policy for Meal Modifications](#)" in section 5);
- procedures for parents and guardians to request meal modifications for children whose disability restricts their diet, including how to complete the medical statement (see "[Medical Statement Requirements](#)" in section 2);

1 | Overview

- procedures for obtaining nutrition information for school meals and ASP snacks (see “[Nutrition Information](#)” in section 2); and
- procedural rights of parents and guardians for grievance procedures (see “[Procedural Safeguards](#)” in section 5).

The policy and SOPs for meal modifications should be posted on the LEA’s website and shared with students and parents/guardians through other means. Examples include parent handbooks, newsletters, e-mails, handouts, menu backs, bulletin boards and displays, meetings, parent events, and public service announcements.

The USDA’s regulations [7 CFR 15b.7\(a\)](#) require SFAs to notify program participants of the process for requesting meal modifications and the individual responsible for coordinating modifications. Methods of initial and continuing notification may include:

- posting of notices;
- placement of notices in relevant publications;
- radio announcements; and
- other visual and auditory media.

As part of this notification, SFAs should explain when parents or guardians must submit supporting documentation for their child’s meal modification request. To receive reimbursement for meal modifications that do not follow the meal patterns, the USDA requires that SFAs must have a medical statement signed by a recognized medical authority (or IEP or 504 plan, if applicable)

The USDA’s nondiscrimination regulations ([7 CFR 15b.25](#)) require LEAs to establish a process for procedural safeguards that provides notice and information to parents or guardians regarding how to request a reasonable modification and their procedural rights for grievance procedures.

Examples of methods for notifying parents and guardians are:

- including information about modification requests when sending out applications for free and reduced-price school meals;
- posting a flier with information about modification requests at the entrance of the school or school cafeteria;
- including information about modification requests in student and parent handbooks, which are provided annually; and
- posting information about modification requests in the same place where school lunch menus are posted on the district’s website.

In addition, the CSDE strongly encourages LEAs to develop written policies for meal modifications that provide clear guidelines for students, parents and guardians, and school staff. For more information, see [“Procedural Safeguards”](#) and [“Policies for Meal Modifications”](#) in section 5.

Communicating with school food service personnel

Close communication between school health services staff and school food service personnel is essential to ensure that children receive appropriate meal modifications. LEAs must establish procedures for identifying children with special dietary needs and providing this information to the staff responsible for feeding the children.

School food service personnel should have access to the applicable information in children’s medical statements to allow appropriate meal modifications. The [Family Educational Rights and Privacy Act \(FERPA\)](#) allows the sharing of confidential student information when there is a legitimate educational interest, such as making meal modifications for special dietary needs. For more information, see [“Storage of medical statements”](#) in section 2.

For some medical conditions, such as food allergies, it may be appropriate for LEAs to maintain information for school food service personnel in the form of a list identifying the children and their food restrictions, along with the appropriate substitutions designated by each child’s medical statement. This list would be adequate to document the substitutions in the USDA’s meal patterns if the school or institution has the original signed medical statements on file. The CSDE evaluates documentation for meal modifications as part of the USDA’s Administrative Review of the district’s school nutrition programs. For information on the administrative review, visit the CSDE’s [Administrative Review for School Nutrition Programs](#) webpage.

Note: Schools and institutions must protect the privacy of children who have a disability, and must maintain the confidentiality of each child’s medical condition. SFAs cannot implement policies or practices that outwardly identify children whose disability requires a meal modification. If the school or institution uses lists to identify children and their food restrictions, these lists must be in locations that are only visible to school food service staff, such as the kitchen and behind counters and serving lines. For more information, see [“Identifying Students”](#) in section 2.

Summary of School Food Service Responsibilities

SFAs are responsible for providing meals to all children, including children with disabilities. The following summarizes the responsibilities of school food service personnel regarding meal modifications in the USDA’s school nutrition programs.

Meal pattern substitutions

- School food service personnel must make reasonable meal modifications on a case-by-case basis for children whose disability restricts their diet, based on a medical statement signed by a recognized medical authority. For more information, see [section 2](#).
 - The USDA does not require SFAs to obtain a medical statement for modified meals that meet the meal patterns. For example, if a child has an allergy to strawberries, SFAs may substitute grapes. This substitution meets the meal patterns because both food items are from the fruits component. However, the USDA strongly recommends that SFAs keep documentation on file acknowledging the child’s disability. The CSDE recommends obtaining a medical statement to ensure clear communication between the school food service program, school nurse, parents or guardians, medical professionals, and applicable school staff about the appropriate meal modifications for the child. This serves as a precaution to ensure that children receive safe and appropriate meals, protect the LEA, and minimize misunderstandings.
- School food service personnel are encouraged, but not required, to provide optional meal modifications on a case-by-case basis for children whose dietary needs do not constitute a disability. Optional meal modifications for children without disabilities must comply with the meal patterns. For more information, see [section 3](#).
 - The USDA does not require SFAs to obtain a medical statement for modified meals that meet the meal patterns. However, the CSDE recommends obtaining a medical statement to ensure clear communication between the school food service program and parents or guardians about the appropriate meal modifications for the child.
- School food service personnel must have documentation on file for all meal modifications that do not comply with the meal patterns, i.e., modifications for children with disabilities. For more information, see “[Storage of medical statements](#)” in section 2.
 - SFAs should not deny or delay a requested modification because the medical statement does not provide complete information or needs clarification. CACFP facilities should work with parents and guardians to obtain additional information

from the recognized medical authority.. For more information, see “[Handling missing information](#)” in section 2.

- Under no circumstances should school food service personnel revise or change a diet prescription or medical order. SFAs must make a reasonable modification based on the instructions written by the recognized medical authority in the child’s medical statement.

For guidance on determining when SFAs are required to make reasonable meal modifications, see [table 1](#) and “[Requirements for Meal Modifications](#)” in this section.

Accessibility

The USDA’s nondiscrimination regulations (7 CFR 15 b.26(d)(2)) specify that where existing food service facilities are not completely accessible and usable, SFAs may provide aides or use other equally effective methods to serve food to children with disabilities. The school or institution is responsible for the accessibility of food service sites and for ensuring the provision of aides when needed.

As with additional costs for meal modifications, any additional costs for adaptive feeding equipment or aides are allowable costs for school nutrition programs. However, the USDA does not provide additional reimbursement. For more information, see “[Allowable costs](#)” in this section.

The USDA’s nondiscrimination regulations also require that schools and institutions provide meal services in the most integrated setting appropriate to the needs of children with disabilities. For more information, see “[Appropriate Eating Areas](#)” in section 2.

Cooperation

School food service personnel should work closely with parents or guardians, the school nurse, school administrators, and other appropriate individuals who are responsible for the health, well-being, and education of children with disabilities or with other special dietary needs, to ensure that the SFA makes reasonable modifications to allow participation in the meal service. This cooperation is particularly important when accommodating children whose disabilities require significant modifications or personal assistance. For more information, see “[Team approach](#)” and “[Communicating with parents and guardians](#)” in this section.

2 — Modifications for Children with Disabilities

The USDA's nondiscrimination regulations (7 CFR 15b) and regulations for school nutrition programs (7 CFR 210.10(m) and 7 CFR 220.8(m)) require that SFAs make reasonable modifications on a case-by-case basis for children whose disability restricts their diet, when a recognized medical authority certifies the need. Meal modifications must be related to the child's disability or limitations caused by the disability, and require a medical statement signed by a recognized medical authority.

- A **reasonable modification** is a change or alteration in policies, practices, and/or procedures to accommodate a disability that ensures children with disabilities have equal opportunity to participate in or benefit from a program. The general guideline in making accommodations is that children with disabilities must be able to participate in and receive benefits from programs that are available to children without disabilities.
- **Case-by-case basis** means that the meal modifications are specific to the individual medical condition and dietary needs of each child.
- The Connecticut State Department of Public Health (DPH) defines a **recognized medical authority** as a state-licensed healthcare professional who is authorized to write medical prescriptions under state law. This includes physicians (MD), physician assistants (PA) and certified physician assistants (PAC), doctors of osteopathy (DO), and advanced practice registered nurses (APRN). These are the **only** medical professionals who are authorized to sign a child's medical statement for meal modifications. SFAs cannot accept medical statements signed by any other individuals.

Examples of conditions that might require meal modifications include, but are not limited to:

- autism;
- cancer;
- celiac disease;
- cerebral palsy;
- diabetes;
- food allergies;



2 | Children with Disabilities

- food intolerances, e.g., lactose intolerance and gluten intolerance;
- heart disease;
- metabolic disorders;
- phenylketonuria (PKU);
- seizure disorder;
- severe obesity; and
- certain temporary disabilities (see “[Temporary Disabilities](#)” in this section).

These examples of medical conditions are not all-inclusive and might not require meal modifications for all children. All disability considerations must be reviewed on a case-by-case basis.

Definition of Disability

Each federal law specifies the definition of a person with a disability. The definitions under Section 504 of the Rehabilitation Act, the ADA (including the ADA Amendments Act), and the USDA’s nondiscrimination regulations are summarized below.

Section 504 of the Rehabilitation Act and the ADA

Under Section 504 of the Rehabilitation Act and the ADA, a “person with a disability” means any person who 1) has a physical or mental impairment that substantially limits one or more major life activities, 2) has a record of such an impairment, or 3) is regarded as having such an impairment. Within the school setting, it is extremely rare to have a child qualify for services under parts 2 and 3 of the definition.

The [final rule](#) (28 CFR Parts 35 and 36) for the ADA Amendments Act includes examples of diseases and conditions that may qualify an individual for protection under Section 504 or the ADA, if the disease or condition meets the qualifying criteria for a physical or mental impairment under Section 504 or the ADA. This list is not all-inclusive.

- orthopedic, visual, speech, and hearing impairments;
- cerebral palsy;
- epilepsy;
- muscular dystrophy;
- multiple sclerosis;
- cancer;
- heart disease;

- diabetes;
- intellectual disability;
- emotional illness;
- dyslexia and other specific learning disabilities;
- Attention Deficit Hyperactivity Disorder;
- Human Immunodeficiency Virus infection (whether symptomatic or asymptomatic);
- tuberculosis; and
- drug addiction and alcoholism. **Note:** An individual who is currently engaging in the illegal use of drugs, when a school district acts based on such use, is not a protected individual with a disability under either Section 504 or the ADA. This exclusion does not include individuals currently participating in, or who have successfully completed, a supervised drug rehabilitation program and are no longer engaging in such drug use.

The final rule for the ADA Amendments Act defines “**major life activities**” as including, but not being limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, writing, communicating, interacting with others, and working.

“Major life activities” also include the operation of a major bodily function including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive systems. The operation of a major bodily function includes the operation of an individual organ within a body system.

The ADA Amendments Act specifically prohibits “**mitigating measures**” from being used to deny an individual with a disability protection under Section 504. Mitigating measures are things like medications, prosthetic devices, assistive devices, or learned behavioral or adaptive neurological modifications that an individual may use to eliminate or reduce the effects of an impairment. For example, if a child’s diabetes can be controlled through insulin and diet, the child may still qualify for protection because the mitigating measure (insulin) cannot be considered in determining qualification. However, the Section 504 team may use mitigating measures to determine the accommodations needed for the child.

IDEA Act of 2004

Under the IDEA, a child with a “disability” means 1) a child evaluated in accordance with the IDEA as having one or more of the recognized disability categories; 2) the disability adversely affects educational performance; and 3) because of the disability and the adverse impact, the child needs special education and related services. The IDEA 2004 disability categories include:

- autism;
- deaf-blindness;
- deafness;
- emotional disturbance;
- hearing impairment;
- intellectual disability (mental retardation);
- multiple disabilities;
- orthopedic impairment;
- other health impairment (limited strength, vitality or alertness due to chronic or acute health problems such as lead poisoning, asthma, attention deficit disorder, diabetes, a heart condition, hemophilia, leukemia, nephritis, rheumatic fever, sickle cell anemia, and Tourette syndrome);
- specific learning disability;
- speech or language impairment;
- traumatic brain injury;
- visual impairment including blindness; and
- developmental delay (3- to 5-year-old children only).



USDA’s nondiscrimination regulations

While the USDA’s nondiscrimination regulations ([7 CFR 15b](#)) use the term “handicapped” to refer to people with disabilities, this guide uses the terms “disability” and “disabilities” because they are consistent with the current language used in the definitions under Section 504, the ADA and ADA Amendments Act, and the IDEA.

The USDA’s nondiscrimination regulations provide the following definition for handicapped person:

- “Handicapped Person” means any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

- “Physical or mental impairment” means 1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; or 2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments; cerebral palsy; epilepsy; muscular dystrophy; multiple sclerosis; cancer; heart disease; diabetes; mental retardation; emotional illness; and drug addiction and alcoholism.
- “Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.
- “Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.
- “Is regarded as having an impairment” means 1) has a physical or mental impairment that does not substantially limit major life activities but that is treated by a recipient as constituting such a limitation; 2) has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others towards such impairments; or 3) has none of the impairments defined in “physical and mental impairment” above, but is treated by a recipient as having such an impairment.

The USDA’s nondiscrimination regulations require meal modifications for children whose disability restricts their diet. This applies to all children whose physical and mental impairments meet the definition of disability under any of the federal laws, including Section 504, the ADA and ADA Amendments Act, the IDEA, and the USDA’s nondiscrimination regulations. Under the ADA Amendments Act, most physical and mental impairments will constitute a disability.



Determining What Constitutes a Disability

The determination of whether a child has a disability is based on the federal nondiscrimination laws (Section 504, the IDEA, the ADA and ADA Amendments Act, and the USDA's nondiscrimination regulations) and a recognized medical authority's diagnosis of the child's medical condition. The medical statement indicates if the child has a disability (physical or mental impairment) that restricts their diet. Alternatively, this may be indicated in the child's Section 504 plan or IEP, if applicable.

The USDA requires that the medical statement (or Section 504 plan or IEP, if applicable) must include:

- information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet;
- an explanation of what must be done to accommodate the child's disability; and
- if appropriate, the food or foods to be omitted and recommended alternatives.

SFAs can determine if a child requires a meal modification by reviewing question 10 in section B of the CSDE's medical statement form, *Medical Statement for Meal Modifications in School Nutrition Programs*. Question 10 asks if the child has a physical or mental impairment that restricts their diet. If the answer is "Yes," the SFA must make a reasonable meal modification. If the answer is "No," the SFA may choose, but is not required, to make the meal modification. For more information on medical statements, see "[Medical Statement Requirements](#)" in this section.

Under the ADA Amendments Act, most physical and mental impairments will constitute a disability. This includes conditions that impair immune, digestive, neurological, and bowel functions, as well as many others. All disability considerations must be reviewed on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

- Under the ADA Amendments Act, a physical or mental impairment does not need to be life threatening to constitute a disability. Limiting a major life activity is sufficient. For example, a food intolerance, such as lactose intolerance or gluten intolerance, may be considered to be a disability if it substantially limits digestion, a bodily function that is a major life activity. A child whose digestion is impaired by a food intolerance may be a person with a disability, regardless of whether consuming the food causes the child severe distress.
- If a child's condition is not listed under the ADA's categories of diseases and conditions, it cannot be assumed that the condition is not a disability. The ADA's categories of diseases and conditions are not all-inclusive; there are more conditions that meet the definition of disability than are listed in the law.

- The determination of whether a physical or mental impairment constitutes a disability must be made without regard for whether mitigating measures may reduce the impact of the impairment. An impairment may be covered as a disability even if medication or another mitigating measure may reduce the impact on the impairment. For example, the fact that a child may be able to control an allergic reaction by taking medication should not be considered in determining whether the allergy is a disability.
- General health concerns and personal preferences, such as parents who prefer that their children eat a gluten-free diet or organic foods because they believe it is healthier, are not disabilities and do not require meal modifications. This also applies to preferences for nondairy milk substitutes (such as rice milk and almond milk) that do not comply with the USDA's nutrition standards for fluid milk substitutes (see table 4 in section 3). SFAs can never serve noncompliant milk substitutes to children without disabilities, even with a medical statement signed by a recognized medical authority. For more information, see [section 3](#).

Based on the ADA Amendments Act, SFAs and LEAs should not engage in weighing medical evidence against the legal standard to determine whether a particular physical or mental impairment is severe enough to qualify as a disability. The primary concern is ensuring equal opportunity for all children to participate in or benefit from the school nutrition programs. For additional guidance, see [USDA Memo SP 59-2016: Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs](#) and [USDA Memo SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers \(Q&As\)](#).

Section 504 considerations

The determination of whether a child has a disability under Section 504 is through a Section 504 meeting, meeting, which anyone can initiate. A team of professionals who are knowledgeable about the condition of the child reviews the child's data, determines if additional information is needed, and determines if the child qualifies as having a disability under Section 504.

The Section 504 meeting and the Planning and Placement Team (PPT) determines whether the disability affects the child's diet, and therefore requires a meal modification. The PPT is a group of certified or licensed professionals who represent each of the teaching, administrative, and pupil personnel staffs, and who participate equally in the decision-making process to

- 1) determine the specific educational needs of a child eligible for special education; and
- 2) develop an IEP for the child. These are people knowledgeable in the areas necessary to determine and review the appropriate educational program for a child eligible for special education.

If the team determines the child has a disability under Section 504 (because the child has a physical or mental impairment that substantially limits a major life activity), the SFA must make a reasonable modification based on the recognized medical authority's instructions in the child's Section 504 plan. There does not have to be an impact on education for a child with special dietary needs to qualify under Section 504. A child with special dietary needs may qualify under Section 504 if the dietary needs significantly impair the child's major life activity of eating. Accommodations to address the child's dietary needs should be written into a Section 504 plan. A separate Individualized Health Care Plan (IHCP) may be written for the child. In some situations, the IHCP is the child's Section 504 plan.

If the Section 504 meeting determines that the child does not have a disability, the SFA may choose to make meal modifications on a case-by-case basis, but is not legally obligated to accommodate the child.

IDEA considerations

A child with special dietary needs may be eligible for special education through the IDEA under the category of "other health impaired" (OHI), where the special dietary needs or other health concerns are the primary reasons the child meets the OHI criteria. OHI requires a chronic or acute medical condition that results in limited strength, vitality, or alertness or a heightened awareness to stimuli, which adversely affects the child's education performance and causes the child to require specially designed instruction. If the child is eligible under the OHI category, the PPT will need to address the effects of the child's medical condition on educational performance. The PPT must also address the special dietary needs as a related service enabling the child to benefit from the educational program.

A child with special dietary needs may be eligible for special education under the IDEA in a category of disability other than OHI. For example, a child with traumatic brain injury may also have special dietary needs. The PPT should consider whether the child's special dietary needs are such that the school should provide related services to enable the child to benefit from instruction. A child identified as having a disability and receiving services under the IDEA will have an IEP.

For children with special dietary needs, the IEP may contain goals and objectives directly related to the child's dietary needs, such as feeding goals. In the related service area, the IEP may indicate what school health services the child needs when the special dietary needs are considered. In addition, the modifications and accommodations page of the IEP document should indicate any meal modifications for the child. Services that are necessary to enable the child to benefit from instruction must be written as a related service for the child.

If the dietary needs interfere with the child's ability to benefit from instruction, a plan to address the child's special dietary needs is a related service included in the IEP. In this case, the SFA must make the meal modifications indicated in the IEP.

An IHCP may be all that is necessary if the special dietary issues do not affect the child's education. When a child is neither eligible for special education nor qualifies under Section 504, an IHCP should be written to address the child's nutritional needs.

Other considerations

The recognized medical authority is not responsible for determining if a child qualifies as having a disability under Section 504 or if a child is eligible for special education under the IDEA. The PPT conducts the PPT meeting to determine a child's eligibility for special education under the IDEA. The Section 504 team conducts the Section 504 meeting to determine if a child has a disability.



A child's medical condition might not necessarily qualify as having a disability under Section 504 or the IDEA. However, it may qualify as a disability under the ADA Amendments Act, and may therefore require a reasonable meal modification when a recognized medical authority certifies the need.

The child's medical statement signed by a recognized medical authority identifies how the physical or mental impairment restricts the child's diet and explains what must be done to accommodate the child. If a recognized medical authority determines that a child's disability requires a meal modification, the SFA must make a reasonable meal modification, even if:

- the child is not determined to have a disability under Section 504 or the IDEA; or
- the parent or guardian has not requested services under either of these laws.

For example, a food intolerance, such as lactose intolerance or gluten intolerance, is not considered to be a disability under Section 504 or the IDEA. However, under the ADA Amendments Act, a food intolerance may be considered to be a disability if it substantially limits digestion, a bodily function that is a major life activity. A child whose digestion is impaired by a food intolerance may be a person with a disability, regardless of whether consuming the food causes the child severe distress.

Medical Statement Requirements

For children whose disability restricts their diet, the USDA requires that the medical statement to request meal modifications must include:

- information about the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet;
- an explanation of what must be done to accommodate the child’s disability; and
- if appropriate, the food or foods to be omitted and recommended alternatives.

In some cases, more information may be required. For example, if the child requires caloric modifications or the substitution of a liquid nutrition formula to accommodate a disability, the recognized medical authority should include this information in the medical statement.

However, school officials cannot request medical records or medical charts related to a child’s disability as part of the medical statement. The medical statement (or Section 504 plan or IEP, if applicable), addressing the three areas above required by the USDA, is the only document required for SFAs to receive reimbursement for modified meals outside of the USDA’s meal patterns. For more information, see [“Medical information in IEP or 504 Plan”](#) in section 2.

Medical statements should provide sufficient information to allow SFAs to provide meals that are appropriate and safe for each child, and comply with the USDA’s requirements.

When necessary, SFAs should work with the child’s parent or guardian to obtain the required information. However, SFAs should not deny or delay a requested meal modification because the medical statement does not provide sufficient information. For more information, see [“Handling missing information”](#) in section 2.

The USDA does not require a medical statement for children with disabilities if the modified meals meet the meal patterns, such as meals modified only for texture (e.g., chopped, ground, or pureed foods) or meals that only substitute food items from the same component.

Examples include substituting a banana for strawberries (fruits component) or chicken for cheese (meat/meat alternates component).

However, the CSDE recommends obtaining a medical statement to ensure clear communication between parents or guardians, medical professionals, and applicable school staff about the appropriate meal modifications for the child. This serves as a precaution to ensure clear communication about safe and appropriate meals for the child, protect the LEA, and minimize misunderstandings. For more information, see [“Medical Statement Requirements”](#) in section 2.

CSDE's medical statement form

The CSDE's medical statement form and instructions assist SFAs with obtaining the information required by the USDA. These documents are available in English and Spanish in the “[Documents/Forms](#)” section of the CSDE's Special Diets in School Nutrition Programs webpage, or the direct links listed below.

- Medical Statement for Meal Modifications in School Nutrition Programs (English):
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNP.pdf>
- Medical Statement for Meal Modifications in School Nutrition Programs (Spanish):
https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNP_Spanish.pdf
- Guidance and Instructions for the Medical Statement for Meal Modifications in School Nutrition Programs (English):
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNPinstr.pdf>
- Guidance and Instructions for the Medical Statement for Meal Modifications in School Nutrition Programs (Spanish):
https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNPinstr_Spanish.pdf

Schools and institutions that use an alternate form must include the three areas required by the USDA. **To protect children's privacy and confidentiality, the medical statement cannot require a specific diagnosis by name or use the term “disabled” or “disability.”**

Medical information in IEP or 504 plan

The SFA does not need obtain a separate medical statement if the child has an IEP or 504 plan that includes the same information required by the USDA, or if the required information is obtained during the development or review of the IEP or 504 plan. Using a team approach can help LEAs to ensure that the IEP or 504 plan will include the information needed to meet the USDA's requirements for the medical statement. Clear communication about the requirements for the medical statement can help reduce the burden for parents and guardians, school food service personnel, and LEA officials working to accommodate children with disabilities in the school setting.

Handling missing information

SFAs should not deny or delay a requested meal modification because the medical statement does not provide sufficient information. An example is a medical statement that does not provide recommended alternatives or fully explain the needed modification for the child. If the medical statement is unclear or lacks sufficient detail, the SFA must obtain appropriate clarification so the child receives safe meals. When necessary, the SFA should work with the child's parent or guardian to obtain an amended medical statement.

While waiting to obtain additional information, the SFA must follow (to the greatest extent possible) the portion of the medical statement that is clear and unambiguous. An example is a medical statement that indicates a child experiences respiratory distress when consuming eggs, but does not identify recommended substitutes. In this case, the SFA should not serve eggs to the child, while waiting for additional information regarding the specific substitutions. Clarification of the medical statement should not delay the SFA from providing a reasonable meal modification for the child.

While waiting for the parent or guardian to submit additional information or a revised medical statement for a child whose dietary needs constitute a disability, the USDA allows SFAs to claim reimbursement for modified meals that do not comply with the meal patterns. In this situation, school officials must document the initial conversation with the parents or guardians when they first learned of the child's need for a meal modification. School officials should follow up with the parents or guardians if the school does not receive the requested medical statement as anticipated, and maintain a record of this contact. School officials should diligently continue to follow up with the parents or guardians until a medical statement is obtained or the request is rescinded.

Declining a request

If the meal modification request is related to the child's disabling condition, it is almost never appropriate for the SFA to decline the meal modification. The exception is a modification request that would fundamentally alter the nature of the USDA's school nutrition programs. An example is a child with a disability who consumes their lunch at home every day, and the parent or guardian requests that the SFA provides modified meals to send home with the child. This modification would not be appropriate because it would fundamentally alter the nature of the USDA's school nutrition programs, which are intended to provide meals to children in the school setting.

Modification requests that would fundamentally alter the nature of the USDA's school nutrition programs are extremely rare. SFAs should contact the CSDE for assistance with any concerns that a requested modification would fundamentally alter the nature of the school nutrition programs. Generally, the emphasis should be working collaboratively with parents or

guardians to develop an effective approach to providing meal modifications for the child. If the SFA declines a meal modification request, the SFA must ensure that the child's parent or guardian understands their rights under the procedural safeguards process. For more information, see "[Procedural Safeguards](#)" in section 5.

Stopping a request

If a child no longer needs a meal modification, the USDA does not require SFAs to obtain written documentation from a recognized medical authority to rescind the original medical order prior to ending a meal modification. However, the USDA recommends that SFAs maintain documentation when ending a child's meal modification. For example, before ending the meal modification, the SFA could ask the child's parent or guardian to sign a statement or send an e-mail indicating their child no longer needs the meal modification.

Storage of medical statements

The CSDE recommends storing medical statements in the student's Cumulative Health Record (CHR) maintained by the school nurse. The CHR serves as the official student health record in Connecticut schools. It is recognized as a formal part of an educational record and must be maintained as such. The CHR provides a systematic way to organize the collection of student health information.



The school nurse may share copies of student medical statements with school food service personnel for the purposes of meal modifications for children with special dietary needs. The [Family Educational Rights and Privacy Act](#) (FERPA) allows the sharing of confidential student information when there is a legitimate educational interest, such as making meal modifications for special dietary needs. The school food service department should have access to this information to allow food service personnel to make appropriate meal modifications for each child.

Updates of medical statements

The USDA's regulations do not specify time limits on medical statements or require SFAs to obtain updated medical statements on a regular basis. However, when parents or guardians provide updated medical information, schools and institutions must ensure that the medical statements on file reflect children's current dietary needs. Changes to diet orders must be in writing on a medical statement signed by a recognized medical authority (or updated in the child's IEP or Section 504 plan, if applicable).

2 | Children with Disabilities

Since a child's dietary needs may change over time, the CSDE strongly recommends that schools and institutions develop a plan for ensuring that the dietary information on file is current. For example, a school's policy could request an updated medical statement whenever a child has a physical, transitions to a different school, requires a new meal modification, or requires a change to an existing meal modification. SFAs may require updates as necessary to meet their responsibilities. When establishing these requirements, the USDA recommends carefully considering if obtaining additional medical statements could create a burden for parents or guardians.

Conflicting information

If there is a conflict between the information in the child's medical statement and information provided either verbally or in writing by the child's parent or guardian, the SFA should request a revised medical statement. For example, a medical statement indicates that a child's disability requires avoiding all foods containing lactose, but the parent tells the cafeteria manager that her child can eat yogurt and cheese. In this situation, the SFA should request a revised medical statement that clarifies the change in the meal modification, and is signed by the child's recognized medical authority. This ensures clear communication between the parents or guardians, school food service program, and school nurse regarding the appropriate meal modification for the child.

Updated information is important because the USDA requires that food service staff must make a reasonable meal modification based on the instructions in the child's medical statement. The USDA does not allow school food service personnel to diagnose health conditions, perform nutritional assessment, prescribe nutritional requirements, or interpret, revise, or change a diet order from a recognized medical authority.

Episodic Disabilities

The requirements for providing meal modifications for children with disabilities apply regardless of the duration of the disability. If a child's disability is episodic and substantially limits a major life activity when active, the SFA must provide a reasonable modification based on the child's medical statement signed by a recognized medical authority. Examples of episodic disabilities include mental illness, multiple sclerosis, Crohn's colitis, and some forms of cancer.

Temporary Disabilities

SFAs must provide meal modifications for children with disabilities, regardless of whether the disability is permanent or temporary. The determination of whether a temporary impairment is a disability must be on a case-by-case basis, taking into consideration both the duration (or expected duration) of the impairment and the extent to which it actually limits a major life activity of the affected individual. If a child's condition is temporary, but severe and lasts for a significant duration, the SFA must provide a reasonable modification for the duration of the condition. Examples of a temporary disability include:

- a child who had major oral surgery due to an accident and is unable to consume food for a significant period of time unless the texture is modified;
- a child who is on medication for several months, and the medication requires avoidance of certain foods; and
- a child who had knee surgery and uses crutches so they are unable to carry a lunch tray.

If a child has a temporary disability, the SFA must make the requested meal modification, even though the child is not “permanently” disabled. However, temporary illness or injury, such as a cold, the flu, or a minor broken bone, are generally not considered to be conditions that require reasonable meal modifications.

Same Meal

The SFA is not required to provide a modified meal that is the same as the meal offered on the regular school menu. The SFA is responsible for serving the child a safe meal that accommodates the disability, but is not responsible for serving the same meal. For example, if the regular lunch entree item is whole grain-rich (WGR) pasta with cheese, the SFA is not required to prepare WGR pasta with lactose-free cheese for a child with lactose intolerance. The SFA could meet the requirement for a reasonable modification by serving a different entree that meets the child's dietary need to avoid lactose, such as a turkey sandwich on WGR bread.

Specific Brands of Food

SFAs may consider expense and efficiency in choosing an appropriate approach to accommodate a child's disability. SFAs must offer a reasonable modification that effectively accommodates the child's disability and provides equal opportunity to participate in or benefit from the school nutrition programs. The USDA does not generally require SFAs to provide the exact substitution or other modification requested in the child's medical statement, such as a specific brand of food or nutrition supplement, unless it is medically necessary. In most cases, a generic brand is sufficient.

For example, a child's medical statement for a food allergy might request a specific brand of food as a substitute. The SFA is generally not required to provide the requested brand of food, but must offer to provide a substitute that does not contain the specific allergen that affects the child. The meal substitution can include any brand or type of food that meets the child's specific dietary needs.

In situations where the requested substitute is very expensive or difficult to procure or obtain, it is reasonable for the SFA to follow up with the parent or guardian to see if a different substitute would be safe and appropriate for the child. For example, if the medical statement lists a specific brand of gluten-free chicken patty, the SFA could check with the child's parent or guardian to see if it would be safe and appropriate to provide a different gluten-free brand or a different gluten-free food item. For example, appropriate substitutes might include:

- a different brand of gluten-free chicken patty that meets the child's specific dietary needs;
- another type of chicken that meets the child's specific dietary needs, e.g., gluten-free grilled or baked chicken; or
- another type of food that meets the child's specific dietary needs, e.g., gluten-free hamburger or sliced turkey.



In this instance, the parent or guardian could affirm that the change meets the child's dietary needs.

Number of Alternate Meals

The USDA's regulations do not require a specific number of alternate meals to meet the dietary needs of children with disabilities. SFAs are obligated to offer children with disabilities a medically appropriate and reasonable meal modification, based on the medical statement signed by a recognized medical authority. Each request must be assessed on a case-by-case basis to determine the specific and appropriate modification for the individual child, including the number of alternate meals.

In certain cases, a child may have a restricted diet that requires the same modified meal each day. However, most children will be able to eat a variety of modified meals over the week. Depending on the child's individual medical condition and the recognized medical authority's instructions, a reasonable modification could be offering:

- the same modified meal that meets the child's specific dietary needs each time the child eats school meals; or

- a cycle menu of modified meals that meet the child's specific dietary needs, based on input from the child's parent or guardian, medical professionals, school nurse, school dietitian, and other appropriate individuals.

Whenever possible, the USDA encourages SFAs to offer children with disabilities a variety of options over the school week that is similar to the weekly variety of options offered to children without disabilities. To improve nutrition and increase variety, the CSDE encourages SFAs to develop a cycle menu of modified meals that meet specific dietary needs, such as a five-day cycle menu for a gluten-free diet or a two-week cycle menu for a specific food allergy. Before using the same cycle menu for multiple children with the same medical condition, SFAs should check with each child's parents or guardians to ensure that the modified meals meet their child's specific dietary requirements.

Different Portion Sizes

If a child with a disability has a medical statement requiring portion sizes that are different from the minimum quantity requirements in the USDA's meal patterns, the SFA must provide the specified portions. Examples include:

- an additional amount of a specific meal pattern component in the meal, such as a second serving of the meat/meat alternates component or grains component;
- a smaller amount of food than the minimum portion size required in the meal patterns, such as 1 ounce of the meat/meat alternates component instead of 2 ounces of the meat/meat alternates component for grades 9-12; and
- requiring that a child receives two of the same meal, such as two lunches. **Note:** While the SFA must provide the two meals prescribed by the recognized medical authority, the USDA's regulations require SFAs to claim only one lunch per child per day.

The child's medical statement (or Section 504 plan or IEP, if applicable) must specify any requirements for different portion sizes.

Texture Modifications

Unless otherwise specified by the recognized medical authority, meals modified for texture (such as chopped, ground, or pureed) should only consist of the same food items and quantities specified in the regular school menus. SFAs should work with the school nurse to provide school food service staff with proper training on pureeing foods and any additional auxiliary aids or services (including necessary equipment) to implement texture modifications.



2 | Children with Disabilities

SFAs cannot make changes or substitutions to the original texture modification request in a child’s medical statement without consulting the child’s parent or guardian. For example, if the medical statement for a child with a disability requests pureed food, the SFA cannot substitute baby food unless it is appropriate for the child and effectively accommodates the child’s specific dietary needs. In this example, the SFA cannot serve baby food as an alternative to pureeing the regular school menu unless the parent or guardian agrees, and a revised medical statement confirms that baby food is an appropriate modification to meet the child’s specific dietary needs.

As with all meal modifications, continued communication between the SFA and the child’s parent or guardian is essential to ensure that children with a disability receive an appropriate texture modification. All texture modifications for children whose disability restricts their diet must be made on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child. An appropriate texture modification for one child might not be appropriate for another child.

Meals and ASP snacks that consist only of texture modifications must meet the USDA’s meal patterns. For grades K-12 in the NSLP and SBP, texture-modified meals must also meet the dietary specifications, and are included in the CSDE’s nutrient analysis of school menus, when a nutrient analysis is required as part of the Administrative Review of school nutrition programs.

Medical statements are not required when texture is the only meal modification. LEAs may apply stricter guidelines and require that SFAs keep a medical statement on file concerning the needed texture modifications. The CSDE recommends obtaining a medical statement to ensure clear communication between the school food service program, school nurse, parents or guardians, medical professionals, and applicable school staff about the appropriate meal modifications for the child. This serves as a precaution to ensure clear communication about safe and appropriate meals for the child, protect the LEA, and minimize misunderstandings.

As with other dietary substitutions, the USDA does not provide additional reimbursement for texture-modified meals and ASP snacks. If a child must have a pureed meal, it is reasonable to expect the school food service account to purchase a blender or food processor and to have the meal prepared by school food service personnel. For more information on texture modifications, see the CSDE’s publication, [*Guidelines for Feeding and Swallowing Programs in Schools*](#).

Tube Feedings

If a child is determined under Section 504 to have a disability that requires tube feedings, the child's Section 504 plan will include feeding and swallowing as a component. Feeding and swallowing disorders are not a disability category in the IDEA. Therefore, if a child is determined to have a disability under the IDEA, the PPT will include feeding and swallowing as a related service of the child's IEP.

For children whose disability requires tube feedings, the USDA recommends using commercial nutrition formulas prescribed by a recognized medical authority and specially designed for tube feedings. School-blenderized formula may be subject to spoilage and might not always have the correct consistency or nutrition content. Proper administration of this type of feeding generally requires the skills of specially trained personnel, such as nurses or specially trained aides who regularly work with the child.

If the child has an IEP, special education funds may cover the cost of commercial tube feeding formulas and special personnel. If the child does not have an IEP, these costs may, as appropriate, be charged in part to the SFA or assigned to the school district's general fund or other funding sources. For more information, see "[Allowable Costs](#)" in section 1.

With appropriate documentation on the medical statement, the SFA could be responsible on a case-by-case basis for the cost of tube feeding formulas that are required as substitutions. However, school food service personnel are not responsible for physically feeding the child. For more information on tube feedings, see the CSDE's publication, *[Guidelines for Feeding and Swallowing Programs in Schools](#)*.

Administering Feedings

When children with disabilities require assistance in eating, the determination of who will feed the child is a local school decision. While the SFA is responsible for providing the necessary foods for children with disabilities, school food service personnel are not responsible for physically feeding the children.

LEAs should be aware of the potential liability if personnel without sufficient training and direction are performing tasks or activities such as developing or modifying a diet order prescribed by a recognized medical authority or administering tube feedings. Proper administration of this type of feeding generally requires the skills of specially trained personnel, such as nurses or the special trained aides who regularly work with the child.

Meal Services Outside the USDA's School Meal Programs

The general guideline in making meal modifications is that children with disabilities must be able to participate in and receive benefits from programs that are available to children without disabilities. SFAs are not required to provide meal services to children with disabilities when the meal service is not normally available for the general student body. For example, if a school does not participate in the SBP, the SFA is not required to provide breakfast for children with disabilities. However, there are the two exceptions when SFAs must provide meal services that are not normally available for the general student body.

1. If a child with a disability has an IEP that requires a meal that the school or institution does not provide, the LEA (school or institution) must provide the meal service at no cost to the family and may choose to have the SFA handle this responsibility. The IDEA requires that any nutrition-related services included in a child's IEP that are deemed necessary for the child to receive a free appropriate public education must be provided at public expense, and at no cost to the child's family. For more information, see "[Allowable Costs](#)" in section 1.
2. If a child with a disability resides in a residential child care institution (RCCI) and requires special meal services, the RCCI serves as the child's home and the child has no other recourse for meals. The RCCI must provide all required meal services prescribed by the recognized medical authority in the child's medical statement or IEP.

Special foods or nutrition supplements

If the medical statement (or Section 504 plan or IEP, if applicable) documents that special foods or nutrition supplements are medically necessary for a child with a disability, the SFA is generally required to provide them as part of reimbursable meals and ASP snacks. For example, if the child's medical statement indicates that special foods or nutrition supplements are medically necessary, the SFA must provide them as part of reimbursable meals and ASP snacks. In some cases, other funding sources may be available to cover these costs. For more information, see "[Allowable Costs](#)" in section 1.

The SFA is not required to pay for other servings of special foods or nutrition supplements throughout the school day **outside** of reimbursable school meals, unless the child has an IEP that requires them. If the IEP includes special foods or nutrition supplements outside of the normal school meal periods, the LEA's administration is responsible for providing them and allocating the cost of making these accommodations. Table 2 shows examples of when special foods or nutrition supplements are required for children with disabilities.

Table 2. Criteria requiring special foods for children with disabilities

Scenario	Are special foods required?
<p>Child has a disability but no IEP: A medical statement for a child with a disability requires six cans of a nutrition supplement during the school day, including two cans at breakfast, one can in the mid-morning as a snack, two cans at lunch, and one can in the mid-afternoon as a snack. The child does not have an IEP.</p> <p>Is the SFA required to provide and pay for all six servings?</p>	<p>No. The general guideline in making accommodations is that children with disabilities must be able to participate in and receive benefits from programs that are available to children without disabilities. The SFA must provide and pay for the nutrition supplements as part of any reimbursable meal service provided by the school. The child must pay the regular meal price based on their eligibility for paid, reduced, or free meals.</p> <p>For example, if the school participates in the SBP and the NSLP, the SFA is responsible for purchasing and serving the required nutrition supplements as part of the child's reimbursable meal at breakfast (two cans) and lunch (two cans). However, the SFA is not required to provide the supplements needed for the child's snacks (one can in the mid-morning and one can in the mid-afternoon) because they are outside of the USDA's reimbursable meal service.</p>
<p>Child has a disability and IEP: A medical statement for a child with a disability requires a special food or nutrition supplement three times a day. The child has an IEP that specifies this accommodation.</p> <p>Is the SFA required to provide and pay for all three servings?</p>	<p>It depends on when the food or nutrition supplement is required and how the LEA allocates the cost. Since the child has an IEP, the LEA must make the specified accommodations to school meals and outside of school meals. The SFA must provide and pay for the nutrition supplements as part of any reimbursable meal service provided by the school. The child must pay the regular meal price based on their eligibility for paid, reduced, or free meals.</p> <p>If the special food or nutrition supplement is required at times outside of the USDA's reimbursable meals, the LEA must make the specified accommodation at no cost to the family, and may charge the cost to the SFA or other LEA funding sources. While this is an allowable cost to the school food service program, there may be alternate funding sources that can cover the cost, such as special education funds, the district's general fund, or other funds. The overall responsibility for accommodating children with disabilities rests with the LEA. For more information, see "Allowable Costs" in section 1.</p>

A La Carte Foods

A la carte foods (competitive foods) are foods and beverages sold to students separately from reimbursable meals and ASP snacks in the USDA's school nutrition programs. A la carte foods include, but are not limited to, foods and beverages sold anywhere on school grounds such as cafeteria serving lines, a la carte lines, culinary programs, kiosks, vending machines, school stores, fundraisers, and snack bars.

The required accommodations for children with disabilities apply only to reimbursable meals and ASP snacks served in the USDA's school nutrition programs. They do not apply to foods or beverages that can be purchased in addition to or in place of reimbursable meals.

The SFA is not responsible for providing foods and beverages that are not part of reimbursable meals and ASP snacks, unless they are specifically included in a child's IEP. In this case, the LEA must provide the required foods and beverages at no cost to parents or guardians and may choose to have the SFA handle this responsibility. For more information, see "[Allowable Costs](#)" in section 1.

Offer versus Serve

SFAs cannot use the offer versus serve (OVS) provision to accommodate meal modifications for children with disabilities. SFAs implementing OVS must ensure that children with disabilities have the opportunity to select all required food components for the meal. For example, a child who has celiac disease or gluten intolerance must have a choice of a gluten-free grain item. The SFA cannot use OVS to eliminate a specific food component, such as the grains component, for a child with a disability. For more information on OVS, visit the CSDE's [OVS](#) webpage and review the CSDE's document, [Offer versus Serve Guide for School Meals](#).



Nutrition Information

The USDA considers providing nutrition information for foods served in school meals and ASP snacks to be a component of reasonable meal modifications. The SFA is responsible for making nutrition information for school meals and ASP snacks available to students, families, school nurses, and others as needed. For example, the SFA could provide nutrition information on school menus and the school food service website, and maintain a binder of nutrition labels in the school cafeteria or district food service office that parents or guardians can review. This enables parents or guardians, in consultation with their children's medical professionals, to determine the appropriate meals and ASP snacks for their child's specific dietary concerns.

For example, if a child has a life-threatening food allergy, the SFA must provide information on the ingredients for foods served in school meals. This information allows parents or guardians and appropriate medical personnel to determine which meals are safe for the child to eat, and which meals the SFA must modify to prevent an allergic reaction.

If a product's label does not provide adequate nutrition information, the SFA is responsible for obtaining the necessary information to ensure a safe meal for the child. The SFA should contact the product's supplier or manufacturer to obtain the required nutrition information.



The SFA is not necessarily required to provide nutrition information for all meals, since it would be very burdensome to provide this information. For example, if a child with diabetes must track their carbohydrate intake, the SFA is not required to provide nutrition information for all food choices available during the lunch and breakfast meal service. A reasonable accommodation could be developing a cycle menu with input from the child's parent or guardian, medical professional, school dietitian, school nurse, and other members of the Section 504 team, as appropriate. In this case, the SFA is only required to provide nutrition information for the foods on the planned cycle menu for the special diet, but not all foods offered in the school nutrition programs. For more information, see "[Carbohydrate Counts](#)" in this section.

It is important to have good communication between the school, students, and parents or guardians. When parents or guardians require nutrition information for school meals and ASP snacks, the CSDE recommends providing a monthly menu several weeks in advance. This enables parents or guardians to determine which meals and ASP snacks their child will be eating. It also allows sufficient time for the school food service program to gather nutrition information for the selected meals and ASP snacks to share with the student, parents or

2 | Children with Disabilities

guardians, school nurse, and other appropriate personnel. As a reminder, a best practice is to develop cycle menus for common special diets, such as gluten free, diabetic, and specific food allergies. For more information, see “[Number of Alternate Meals](#)” in this section.

When the SFA obtains meals and ASP snacks from a vendor or through a food service management company, the food service contract should address the requirement for providing nutrition information for meals and ASP snacks. For more information, see “[Procured Meals](#)” in section 4.

Nutrition information for USDA Foods

The USDA provides product information sheets for USDA Foods, which are available at <https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>. These product information sheets include the product’s description, crediting and yield information, culinary tips and recipes, food safety information, and a general Nutrition Facts label. However, they do not include a product-specific Nutrition Facts label or ingredients statement.

For further processed USDA Foods, the nutrition information and ingredients for USDA direct delivery food items (brown box) may vary based on the vendor who received the bid. If a SFA requires product information for students with food allergies or other dietary needs, the SFA must obtain product-specific information from the manufacturer.

To find the nutrition information for USDA direct delivery food items, check the outside of the case or the inside packaging. If nutrition information is not available, check with the product’s manufacturer. The agreement between the Connecticut FDP and processor requires that processors must provide product nutrition information to SFAs upon request and must make available product nutrition information on their website. For additional assistance, contact the Connecticut FDP.

Carbohydrate Counts

The SFA is responsible for providing a carbohydrate count to the parent or guardian of a diabetic child for each food item served in one daily reimbursable meal choice. If the daily menu includes multiple meal choices, the SFA is not required to provide carbohydrate counts for each meal. The CSDE encourages SFAs to develop a diabetic cycle menu with carbohydrate counts, such as a one-week or two-week cycle menu. For more information, see “[Number of Alternate Meals](#)” in this section.

The SFA is responsible for providing information on the initial weights or measures of the planned food for the chosen meal. However, school food service personnel are not responsible for weighing or measuring leftover food after the child has consumed the meal, or

determining the proper amount of carbohydrates needed or consumed. These tasks are the responsibility of the school nurse or other designated medical personnel.

The USDA specifies that school food service personnel can never diagnose health conditions, perform nutritional assessment, prescribe nutritional requirements, or interpret, revise, or change a diet order. If school food service personnel have questions about a child's diet order, prescribed meal substitutions, or any other required modifications, they should consult the appropriate medical personnel who work with the child, such as the school nurse and the child's recognized medical authority or registered dietitian.

For resources on diabetes, visit the [American Diabetes Association](#) website and review the "Diabetes" section of the CSDE's handout, *Special Diets Resource List*.

Food Allergy

A food allergy is a hypersensitivity from an abnormal response of the body's immune system to food or food additives that the body would otherwise consider harmless. While almost any food can trigger an allergic reaction, eight foods cause the majority of reactions. These include milk, eggs, peanuts, tree nuts (e.g., almonds, cashews, pistachios, pecans, walnuts, and hazelnuts), wheat, fish, shellfish (e.g., crab, lobster, and shrimp), and soy. These foods account for 90 percent of food allergic reactions, and are the food sources from which many other ingredients are derived. In addition, sesame is increasingly recognized as a top food allergy.

Under the ADA Amendments Act, a food allergy does not need to be life threatening or cause anaphylaxis to be considered a disability. A non-life-threatening food allergy may be considered to be a disability and require a meal modification if it impacts a major bodily function or other major life activity, such as digestion, respiration, immune response, and skin rash. If a recognized medical authority determines that a food allergy is a disability for a particular child, the SFA must make a reasonable meal modification based on the child's medical statement.

The SFA must provide the child with a safe meal and a safe environment to consume the meal. School food service personnel must ensure that modified meals and ASP snacks meet each child's prescribed guidelines and are free of all ingredients suspected of causing an allergic reaction. The SFA must use proper storage, preparation, and cleaning techniques to prevent exposure to allergens through cross-contact. Cross-contact occurs when allergen-containing ingredients are transferred to allergy-free food by hands, food-contact surfaces, sponges, cloth towels, or utensils. The Section 504 team should develop a strategy or food allergy management plan for the daily management of food allergies for individual children.

2 | Children with Disabilities

Sometimes it is advisable to prepare a separate meal from scratch using ingredients allowed on the special diet, instead of serving a meal using processed foods. The general rule in these situations is to exercise caution at all times. If a food's ingredients are unknown, SFAs cannot serve the food to children who are at risk for allergic reactions.

For more information and guidance on the specific roles and responsibilities of food service personnel regarding food allergies, see “[Food Allergy Management Plan](#)” in section 5 and the CSDE’s publication, *Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools*

Food allergy resources

The resources below provide guidance on managing food allergies in schools.

- Allergies and Food Sensitivities (USDA):
<https://www.nal.usda.gov/fnic/allergies-and-food-sensitivities>
- Avoiding Cross-Contact (FARE):
<https://www.foodallergy.org/resources/avoiding-cross-contact>
- Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) Questions and Answers (FDA):
<https://www.fda.gov/food/food-allergens-gluten-free-guidance-documents-regulatory-information/food-allergen-labeling-and-consumer-protection-act-2004-questions-and-answers>
- Food Allergies for School Nutrition Directors (Institute of Child Nutrition):
<https://theicn.org/icn-resources-a-z/food-allergies-for-school-nutrition-directors/>
- Food Allergy Fact Sheets (Institute of Child Nutrition):
<https://theicn.org/icn-resources-a-z/food-allergy-fact-sheets>
- Food Allergy Research & Education (FARE):
<http://www.foodallergy.org/>
- How to Read a Food Label (FARE):
<https://www.foodallergy.org/resources/how-read-food-label>
- Managing Food Allergies in the Cafeteria: The Role of School Food Service Managers and Staff (CSDE):
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/FoodAllergyPresentation.pdf>
- Managing Food Allergies: School Nutrition Directors Fact Sheet (ICN):
<https://theicn.org/resources/166/food-allergy-fact-sheets/111863/managing-food-allergies-school-nutrition-directors-fact-sheet-2.pdf>

- Managing Food Allergies: School Nutrition Staff Fact Sheet (ICN):
<https://theicn.org/resources/166/food-allergy-fact-sheets/111862/managing-food-allergies-school-nutrition-staff-fact-sheet-2.pdf>
- School Tools: Allergy & Asthma Resources for Families, Clinicians and School Nurses (American Academy of Allergy, Asthma & Immunology):
<https://www.aaaai.org/conditions-and-treatments/school-tools>
- Standard Operating Procedure (SOP): Serving Safe Food to Students with Food Allergies (ICN):
<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105719/serving-safe-food-to-students-with-food-allergies-3.docx>
- Tips for Avoiding Your Allergen (FARE):
<https://www.foodallergy.org/resources/tips-avoiding-your-allergens>
- Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs (CDC):
https://www.cdc.gov/healthyschools/foodallergies/pdf/13_243135_A_Food_Allergy_Web_508.pdf

For more information, see “Food Allergies” under the “[Related Resources](#)” section of the CSDE’s Special Diets in School Nutrition Programs webpage, and the “Food Allergies” section of the CSDE’s handout, *Special Diets Resource List*.

Food Intolerance

A food intolerance is an adverse food-induced reaction that does not involve the body’s immune system. Examples lactose intolerance and gluten intolerance. Under the ADA Amendments Act, a food intolerance may be considered to be a disability if it substantially limits digestion, a bodily function that is a major life activity. For example, a child whose digestion is impaired by lactose intolerance may be a person with a disability, regardless of whether consuming milk causes the child severe distress.

If a recognized medical authority determines that a food intolerance is a disability for a particular child, the SFA must make a reasonable meal modification based on the medical statement. Schools and institutions must review each child’s situation on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

Gluten Sensitivity

Gluten sensitivity (also called gluten intolerance) is a condition with symptoms similar to those of celiac disease that improve when gluten is eliminated from the diet. Gluten sensitivity is a diagnosis of exclusion that requires ruling out celiac disease and wheat/gluten allergy, followed by a period of dietary gluten exclusion to see if the patient gets better, then a gluten challenge to see how the patient reacts. Individuals diagnosed with gluten sensitivity do not experience the small intestine damage found in celiac disease.

Under the ADA Amendments Act, a food intolerance or sensitivity may be considered to be a disability if it substantially limits digestion, a bodily function that is a major life activity. A child whose digestion is impaired by gluten sensitivity may be a person with a disability, regardless of whether consuming gluten-containing foods causes the child severe distress.

If a recognized medical authority determines that gluten sensitivity is a disability for a particular child, the SFA must make a reasonable meal modification based on the child's medical statement. Schools and institutions must review each child's situation on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

Celiac Disease

Celiac disease is a genetic autoimmune digestive disease that damages the small intestine and interferes with the absorption of nutrients from foods. Individuals with celiac disease cannot tolerate gluten, a protein found in wheat, rye, and barley. The treatment for celiac disease is to avoid all foods that contain gluten, including wheat, rye, barley, and any foods made with these grains.

Under the ADA Amendments Act, celiac disease qualifies as a disability because it limits the major life activity of digestion. If a child has celiac disease, the SFA must make a reasonable meal modification based on the medical statement signed by a recognized medical authority.

Many processed foods contain gluten unless they are labeled “gluten-free” or are made with corn, rice, soy, or other gluten-free grains. Foods that are likely to contain gluten include:

- breads and bread products, e.g., pizza crust and muffins;
- pasta and couscous;
- grain-based desserts, such as cookies, cakes, and pies;
- breakfast cereals;
- crackers and snacks, e.g., pretzels, snack mix, pita chips, and croutons;
- seasoned snack foods, e.g., potato and tortilla chips;
- processed luncheon meats;
- soups and soup bases; and

- salad dressings and sauces, including soy sauce.

Table 3 shows examples of foods to avoid and allow with celiac disease. **Note:** This information provides general guidance on foods with and without gluten. When making meal modifications for celiac disease, SFAs must make a reasonable meal modification based on each child's medical statement signed by a recognized medical authority. Schools and institutions must review each child's situation on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

Table 3. Examples of foods to avoid and allow with celiac disease ¹	
Avoid	Allow ²
<ul style="list-style-type: none"> • Barley (malt, malt flavoring, and malt vinegar are usually made from barley) • Rye • Triticale (a cross between wheat and rye) • Wheat <ul style="list-style-type: none"> ◦ Dextrin ◦ Durum flour ◦ Farina ◦ Graham flour ◦ Kamut ◦ Modified food starch ◦ Semolina ◦ Spelt ◦ Wheat germ ◦ What bran • Processed foods unless labeled “gluten-free” or made with corn, rice, soy, or other gluten-free grain 	<ul style="list-style-type: none"> • Beans, seeds, and nuts in their natural, unprocessed form • Fresh eggs • Fresh meats, fish, and poultry (not breaded, batter-coated, or marinated) • Fruits and vegetables • Most dairy products • Gluten-free grains <ul style="list-style-type: none"> ◦ Amaranth ◦ Arrowroot ◦ Buckwheat ◦ Corn flour and cornmeal ◦ Flax ◦ Gluten-free flours (rice, soy, corn, potato, bean) ◦ Hominy (corn) ◦ Millet ◦ Oats ³ ◦ Quinoa ◦ Rice ◦ Sorghum ◦ Soy ◦ Tapioca ◦ Teff
<p>¹ The SFA must make appropriate meal modifications on a case-by-case basis, according to each child's medical statement signed by a recognized medical authority.</p> <p>² These foods are acceptable if they are not processed or mixed with gluten-containing grains, additives, or preservatives.</p> <p>³ Oats must be labeled “gluten-free.” Pure oats are a gluten-free food, but most commercially processed oats have been contaminated during the growing, harvesting, or processing stages.</p>	

For more information and resources, see “Celiac Disease” in the CSDE’s handout, [*Special Diets Resource List*](#).

Autism

Autism is considered to be a disability under the ADA, Section 504, and USDA’s nondiscrimination regulations. Autistic children may require a reasonable meal modification if their autism substantially limits a major life activity such as eating.

Schools and institutions must review each child’s situation on a case-by-case basis, since one child’s autism diagnosis may not have the same issues as another child’s autism diagnosis. Having an autism diagnosis does not automatically qualify a child for meal modifications. Children with autism might not have a medical dietary condition. However, autism sometimes results in food behaviors and preferences that require specific meal modifications. For example, some children with autism have repetitive and ritualistic behavior patterns and will only eat certain foods. Others may be very sensitive to food textures and will only eat foods with a smooth texture.

Any physical or mental impairment that prevents a child from consuming a meal is considered to be a disability. For some autistic children, it is reasonable to view the autism diagnosis as a dietary restriction that is part of their disability. If a recognized medical authority determines that a dietary restriction is part of a child’s autism diagnosis, the SFA must provide a reasonable meal modification based on the child’s medical statement (or Section 504 plan or IEP, if applicable).

The examples below indicate the requirements for meal modifications for children with autism.

Example of aversion to fruits and vegetables

The OVS provision of the NSLP and SBP meal patterns for grades K-12 requires that students must take at least $\frac{1}{2}$ cup of fruits or vegetables for a reimbursable meal. An autistic girl has an aversion to fruits and vegetables that causes behavioral issues if school food service personnel encourage her to take a fruit or vegetable. The parent provides a medical statement signed by the child’s recognized medical authority that supports the elimination of the fruits component and vegetables component due to the child’s autism. The child’s IEP indicates that she is not required to take a fruit or vegetable for a reimbursable meal. In this situation, the SFA must provide the child with meals that do not contain fruits or vegetables, and the SFA may claim reimbursement for these modified meals.



It would be beneficial for the SFA to consult with the child's parent or guardian, or recognized medical authority, to gain a better understanding of the child's autism disability relating to food aversions, and to determine if it is necessary to provide additional calories for the child in the absence of fruits and vegetables. The USDA recommends collecting as much information as possible regarding the child's condition to better meet the child's nutrition needs. This information will also assist the menu planner with making appropriate meal modifications.

Example of preference for heated food

An autistic child has a personal food preference for heated food, but does not have a specific dietary restriction related to the autism. The parents provide a medical statement signed by a licensed physician indicating that the school food service program should heat the child's food sent from home.

In this example, the SFA is not required to heat the child's food. Heating foods sent from home in a food service establishment is a food safety issue governed by state regulations. [Connecticut Public Health Code \(PHC\) 19-13-B42](#) requires that all foods and drinks served in food service establishments must be from an approved source. Foods provided from a private home have not originated from an approved source. SFAs cannot accept foods from unregulated sources, including foods from home or foods purchased by parents or guardians off school premises. For more information, see "[Family-provided Foods](#)" in section 4.

The LEA (not the school food service program) could be required to provide a microwave and heat a child's food sent in from home. This depends on the specific nature of the child's disability and whether the child requires heated food because of the disability or a personal food preference. LEAs must examine each child's disability and special dietary needs on a case-by-case basis. All-inclusive policies are not appropriate.



LEAs should conduct an individualized review of each child's disability and medical information, and consider whether the meal modification is necessary to access education. If the LEA has medical documentation stating that the child's condition is such that he or she cannot eat unless the food is warmed, the LEA (not the school food service program) may be required to make this accommodation. In this case, PHC 19-13-B42 still prohibits the school food service program from accepting foods that are not from approved sources.

Note: During the 2017 Connecticut legislative session, [Senate Bill 901](#) was passed to adopt the FDA Food Code. The new code will replace the following current food regulations: 19-13-B40, 19-13-B42, 19-13-B48, and 19-13-B49. [Public Act 18-168](#) (approved June 13, 2018) included language that extends the date for adoption of the FDA Food Code to “Not later than January 1, 2019.” However, the state regulations to implement the FDA Food Code are still in the regulation review process, and were not approved by January 1, 2019. Therefore, on January 1, 2019, the current food regulations (19-13-B42; 19-13-B40; 19-13-B48; and 19-13-B49) are still in effect and are enforceable by local certified food inspectors, until the state regulations are approved. Contact your [local health department](#) for more information.

Food Preference versus Disability

The federal nondiscrimination laws and the USDA’s regulations require SFAs to make reasonable modifications to accommodate children to whose disability restricts their diet. SFAs meet this requirement if they provide appropriate meal alternatives to accommodate a child’s dietary restriction resulting from a disability. SFAs are not required to provide additional alternatives based on personal preferences.

For example, a SFA provides a reasonable modification for a diabetic child by offering a five-day cycle menu that includes carbohydrate counts for two daily lunch choices. The child does not like any of the choices and refuses the offered meals due to personal food preferences. The SFA is not required to provide additional alternatives based on the child’s personal food preferences because the cycle menu meets the USDA’s requirement for a reasonable meal modification.

As reminder, SFAs are obligated to offer children with disabilities a medically appropriate and reasonable meal modification based on the medical statement signed by a recognized medical authority. However, SFAs are generally not required to provide the specific modification requested in the medical statement, although the specific modification may often be provided. Additionally, SFAs are generally not required to provide a specific brand of food, unless it is medically necessary. For more information, see “[Number of Alternate Meals](#)” and “[Specific Brands of Food](#)” in this section.

Milk Substitutes for Disabilities

When a child has a medically documented disability that requires a milk substitute or a type of milk that does not comply with the meal pattern requirements, the SFA must provide an appropriate substitute based on the child's medical statement signed by a recognized medical authority. The medical statement must include:

- information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet; and
- an explanation of what must be done to accommodate the child's disability, e.g., the type of milk to be omitted from the child's diet and the beverage that should be substituted.

If cow's milk causes any digestive problems, the child's condition is considered to be a disability under the ADA Amendments Act, and requires a substitute. SFAs must make the substitution if the child has a medically documented disability that requires an alternative to milk, such as juice, water, or a nondairy beverage, e.g., soy milk.

Fat content

The USDA's meal patterns for the NSLP, SBP, and ASP require that milk for grades K-12 must be unflavored or flavored low-fat (1%) or fat-free milk. For preschoolers in the NSLP, SBP, and ASP, milk must be unflavored whole milk for age 1, and unflavored low-fat milk or unflavored fat-free milk for ages 2-4. The preschool meal patterns do not allow flavored milk for ages 1-4.

If a child has a medically documented disability that requires milk with a fat content that does not comply with the USDA's meal patterns, the SFA must provide an appropriate substitute based on the medical statement signed by a recognized medical authority. An example is a medical statement signed by a recognized medical authority that indicates a child's disability requires whole milk instead of low-fat milk.

Nondairy milk substitutes

If a child has a medically documented disability that requires a milk alternative, such as soy milk, the SFA must provide an appropriate substitute based on the medical statement signed by a recognized medical authority. Nondairy milk substitutes for children with disabilities are not required to comply with the USDA's nutrition standards for milk substitutes (see [table 4](#) in section 3).

SFAs are generally not required to provide a specific brand of nondairy milk substitute. In most cases, a generic brand is sufficient. The SFA must work with the parent or guardian to offer a reasonable modification that effectively accommodates the child's disability and provides equal opportunity to participate in or benefit from the school nutrition programs. For more information, see "[Specific Brands of Food](#)" in this section.

In situations where the requested milk substitute is very expensive or difficult to obtain, it would be reasonable for the SFA to follow up with the child's parent or guardian to see if a different substitute would be safe and appropriate. For example, if the medical statement lists a specific brand of nondairy milk substitute, the SFA could check with the parent or guardian to see if it would be safe and appropriate to provide a different brand for the child.



Identifying Students

When determining how school food service personnel will identify students during the meal service who require modified meals and ASP snacks due to a disability, the LEA's policies and practices must protect the privacy of children who have a disability, and must maintain the confidentiality of each child's medical condition. The HIPAA and FERPA require that LEAs keep medical information confidential, including medical information related to a child's disability.

The FERPA allows the sharing of confidential student information (such as medical statements) between appropriate school staff (such as school health services and school food services) when there is a legitimate educational interest, which includes meal modifications for children whose disability restricts their diet. However, LEAs cannot make confidential student information available to individuals who do not have a legitimate educational interest.

LEAs cannot implement policies or practices that outwardly identify students whose disability requires a meal modification. This includes practices such as posting student lists in public areas or asking students (or their parents or guardians) to consent to a physical designation, such as wearing a lanyard, bracelet, pin, sticker, or similar item. These types of practices:

- impinge upon the privacy and confidentiality of a student's disability status and medical information;
- are inconsistent with the LEA's duty to keep students' disability and medical information confidential; and
- provide the potential for stigma for students with disabilities.

If a student, without being asked by the LEA, chooses to self-identify with a physical designation such as a lanyard or similar item (or the parent or guardian requests a physical designation for their child), this is less of a privacy concern and is acceptable because the student (or parent or guardian) is voluntarily engaging in the physical designation. This differs from an unacceptable school policy that routinely uses a physical designation and asks students (or parents or guardians) to agree to use it. Under the federal laws that require LEAs to maintain student confidentiality, the student (or parent or guardian) can choose to self-identify, but the LEA cannot outwardly identify the student or ask the student (or parent or guardian) to agree to outward identification.

Acceptable practices

LEAs can use several acceptable practices to help school food service personnel identify students with disabilities during the meal service, while avoiding outward designation. Computer technology, such as the SFA's point-of-sales (POS) cash register system, is the most common and effective method for ensuring students' confidentiality while allowing cashiers to

2 | Children with Disabilities

see each student's dietary restrictions. POS systems typically include the option for SFAs to provide a note that serves as an alert for cashiers when a student has special dietary requirements. SFAs should work with their POS system representative to implement this option and, if needed, request changes to more effectively notify cashiers about relevant student information for meal modifications.

The cafeteria manager should conduct a daily pre-service meeting to review all menu items. All servers and cashiers must be able to identify any menu items that should be avoided for certain dietary restrictions, such as food allergies, lactose intolerance, and gluten intolerance.

The USDA has identified other acceptable practices that maintain students' confidentiality by focusing on identifying meals, not students. These include:



- using other types of computer technology, such as smart phone apps that identify dietary restrictions and link to the POS system or the cafeteria manager's software system;
- using different colored plates or trays to identify meals that meet specific dietary criteria, e.g., nut-free meals on blue plates and gluten-free meals on red plates;
- using colored tags or labels, placards, or similar signage near each food item on the serving line to identify each food item's dietary criteria, such as lactose-free, nut-free, and gluten-free;
- providing regular updates for each student whose disability requires a meal modification and posting this information in locations that are only visible to school food service staff, such as the kitchen and behind counters and serving lines; and
- maintaining ongoing communication with parents and guardians, such as parent forums or meetings, to explain the district's procedures for meal modifications, school menus, and how the cafeteria ensures allergen-free meals. For more information, see ["Communicating with parents and guardians"](#) in section 1.

The general guideline in identifying students whose disability requires a meal modification is to ensure that the LEA's policies and practices protect students' privacy and maintain the confidentiality of each student's medical condition. **Federal laws do not allow LEAs to ask students or their parents or guardians to relinquish confidential medical information through outward identification.**

Appropriate Eating Areas

Federal civil rights legislation, including Section 504 of the Rehabilitation Act of 1973, the IDEA, and Titles II and III of the ADA, requires that in providing nonacademic services, including meals, schools and institutions must ensure that children with disabilities participate along with children without disabilities to the maximum extent appropriate. This allows children to interact with and learn from other children with backgrounds different from their own.

The USDA's nondiscrimination regulations (7 CFR 15b.40 (b)) require that meal services must be provided in the most integrated setting appropriate to the needs of children with disabilities. Exclusion of any child with a disability from the cafeteria is not considered an appropriate or reasonable modification. For example, a child with a disability cannot be excluded from the cafeteria and required to sit in another room during the meal service.

However, under some circumstances it may be appropriate to require children with certain special needs to sit at a separate table. For example, if a child requires significant assistance from an aide to consume their meals, it may be necessary for the child and the aide to have more space during the meal service.

Additionally, SFAs may determine that a separate, more isolated eating area would be best for children with severe food allergies. The separate eating area may be:

- a designated table in the cafeteria cleaned according to food safety guidelines (to eliminate possible cross-contact of allergens on tables and seating); or
- an area away from the cafeteria, where children can safely consume their meals.

Prior to developing a special seating arrangement, the school or institution should determine, with input from the child's parents or guardians and recognized medical authority, if this type of seating arrangement would truly be helpful for the child. If the school develops a special seating arrangement, other children should be permitted to join the child, provided they do not bring any foods that would be harmful to the child.

Schools and institutions cannot segregate children with disabilities from the regular meal service simply as a matter of convenience. In addition, it is not appropriate to simultaneously use a separate table to segregate children who are being punished for misconduct. In all cases, the decision to feed children with disabilities separately must always be based on what is appropriate to meet the children's needs.

Banning Foods

Universal exclusion of specific foods or food groups is not USDA policy, but could be appropriate for an individual LEA depending on local circumstances. However, if a LEA chooses to enact a universal ban, the specific allergen must **never** be present in the school or institution, since students and families will assume the school or institution is a safe place based on the stated ban. The CSDE's publication, *Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools*, provides the following guidance on banning foods.

School-wide bans of specific foods might not render the school environment safe because there is no method for ensuring that the allergenic food does not inadvertently enter school grounds. Bans can create a false sense of security, which can lead to less responsible approaches to effective management strategies, education, and emergency responses. Banning offending foods detracts from the school or institution's responsibility to plan properly for children with life-threatening food allergies, and to educate all school personnel accordingly.

Bans may also limit the opportunity to teach children with allergies to take care of themselves in environments where they may be exposed to allergens at any time. Additionally, banning can be problematic in terms of defining the limits. While it may mean the banning of peanuts for some children, it could also mean the banning of all nuts, milk, wheat, or another food item for other children.



School districts need to consider how to develop a plan that over time will best meet the needs of all students, and prepare them for self-management and advocacy as they transition within and beyond pre-kindergarten through grade 12. School options may include:

- establishing allergen-free zones, such as a child's individual classroom;
- establishing allergen-free tables or areas in the cafeteria;
- establishing food-free zones, such as libraries and music rooms; and
- enforcing relevant school policies, such as prohibiting eating on school buses.

Individual student and family privacy needs and preferences should be considered in determining appropriate plans. Not all students or families will need or want to use an allergen-free zone during the school day.

3 — Modifications for Children Without Disabilities

SFAs have the option to make meal modifications on a case-by-case basis for children whose dietary needs do not constitute a disability. However, the USDA does not require these accommodations. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as a family’s preference that their children eat a gluten-free diet or organic foods because they believe it is healthier.

Modified meals and ASP snacks served to children without disabilities must always comply with the USDA’s meal patterns. For grades K-12 in the NSLP and SBP, modified meals must also meet the weekly dietary specifications, and are included in the CSDE’s nutrient analysis of school menus, when a nutrient analysis is required as part of the Administrative Review of school nutrition programs.

The USDA does not require a medical statement for modified meals and ASP snacks that meet the meal patterns. These meals and snacks are eligible for reimbursement regardless of whether the SFA obtains a medical statement. However, the CSDE recommends obtaining a medical statement for optional modifications to ensure clear communication between parents or guardians and all appropriate school staff about the appropriate modifications for the child. This serves as a precaution to ensure safe and appropriate meals for the child, protect the LEA, and minimize misunderstandings.

SFAs can use the CSDE’s medical statement form, *Medical Statement for Meal Modifications in School Nutrition Programs*, to collect information for making meal modifications for children without disabilities. The form and instructions are available in English and Spanish in the “[Documents/Forms](#)” section of the CSDE’s Special Diets in School Nutrition Programs webpage.



Milk Substitutes without Disabilities

The USDA's meal patterns for grades K-12 in the NSLP, SBP, and ASP require unflavored or flavored low-fat (1%) or fat-free milk. The preschool meal patterns require unflavored whole milk for age 1, and unflavored low-fat milk or unflavored fat-free milk for ages 2-4. The preschool meal patterns prohibit flavored milk for ages 1-4.

For children without disabilities, reimbursable meals and ASP snacks cannot include any types of milk that do not meet the meal pattern requirements, even with a medical statement signed by a recognized medical authority. For example, meals and ASP snacks for grades K-12 cannot include unflavored or flavored whole or reduced-fat (2%) milk; meals and snacks for age 1 cannot include unflavored or flavored reduced-fat (2%) milk, unflavored or flavored fat-free milk, or unflavored or flavored low-fat milk; and meals and snacks for ages 2-4 cannot include unflavored or flavored whole milk, unflavored or flavored reduced-fat (2%) milk, flavored fat-free milk, or flavored low-fat milk. The USDA does not allow milk that does not comply with the meal patterns unless the child has a medically documented disability. For more information, see [“Milk Substitutes for Disabilities”](#) in section 2.

SFAs may choose, but are not required, to offer one or more allowable milk substitutes for children whose dietary needs do not constitute a disability. The two types of allowable substitutes for children without disabilities include:

- low-fat (1%) or fat-free lactose-reduced or lactose-free milk; and
- nondairy beverages that meet the USDA's nutrition standards for fluid milk substitutes and the state beverage requirements of C.G.S. Section 10-221q, such as certain brands of soy milk.

The USDA does not provide additional reimbursement for SFAs that choose to provide these substitutions. The requirements for milk substitutes are summarized in this section, and in the CSDE's handout, [Milk Substitutes for Children without Disabilities in School Nutrition Programs](#).

Required documentation for milk substitutes

Milk substitutions for children without disabilities do not require a medical statement from a recognized medical authority. Parents or guardians may request a nondairy milk substitute in writing. For example, the parent of a vegetarian child can submit a written request asking the SFA to substitute an allowable brand of soy milk for cow's milk. An allowable brand is one that meets the USDA's nutrition standards for fluid milk substitutes (see table 4). **Note:** Except for allowable nondairy milk substitutes, any other meal pattern substitutions for vegetarian diets must meet the USDA's requirements for reimbursable meals and ASP snacks. For more information, see [“Vegetarians”](#) in section 4.

The written request must identify the medical or other special dietary need that restricts the child's diet. Schools and institutions must maintain parent or guardian requests for milk substitutes on file with children's medical records. For more information, see "[Storage of medical statements](#)" in section 2.

The USDA's provision allowing a written request from parents or guardians applies only to milk substitutes for children **without** disabilities. It does not apply to any other substitutions of foods or beverages in reimbursable meals and ASP snacks for children without disabilities.

Lactose-reduced and lactose-free milk

Lactose-reduced milk has part of the lactose removed, while lactose-free milk has all of the lactose removed. Like regular milk, these types of milk come in a variety of flavors and fat contents, such as fat-free (skim), low-fat, and whole.

Lactose-reduced and lactose-free milk that meets the meal pattern requirements for preschoolers and grades K-12 credits as the milk component in school meals. SFAs can substitute lactose-reduced and lactose-free milk (with the appropriate fat content) for regular milk, without a written statement from a parent or guardian. The CSDE encourages SFAs to make lactose-reduced or lactose-free milk available to children as needed.



In addition to meeting the USDA's meal pattern requirements, any lactose-reduced and lactose-free milk sold in public schools, either as part of school meals or a la carte, must meet the state beverage requirements of C.G.S. [Section 10-221q](#). The state beverage requirements do not apply to private schools or RCCIs.

C.G.S. Section 10-221q requires that milk cannot contain more than 4 grams of sugar per ounce and cannot contain artificial sweeteners. Lactose-reduced and lactose-free milk that does not meet the state requirements of C.G.S. Section 10-221q cannot be served as part of reimbursable meals and ASP snacks, or sold a la carte in public schools. List 16 on the CSDE's [List of Acceptable Foods and Beverages](#) webpage includes products that meet the USDA and state requirements.

SFAs cannot charge more for reimbursable meals and ASP snacks that contain lactose-free milk or lactose-reduced milk, but can sell these types of milk a la carte for a higher price than regular milk. As with any a la carte item, the price charged to students should reflect the actual cost of the item plus an amount determined by the SFA's formula for a la carte pricing. For more information, see the CSDE's worksheet, [Pricing Worksheet for A La Carte Sales in School Nutrition Programs](#).

Acceptable nondairy beverages for milk substitutes

The USDA's regulations allow SFAs to offer nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes (see table 4). The USDA does not provide additional reimbursement for SFAs that choose to provide these substitutions.

The USDA's nutrition standards require that milk substitutes must be nutritionally equivalent to fluid milk and provide specific levels of calcium, protein, vitamins A and D, magnesium, phosphorus, potassium, riboflavin, and vitamin B₁₂. This ensures that children without disabilities who require a substitute for cow's milk for cultural, ethnic, religious, or medical reasons receive the important nutrients found in milk. Nondairy milk substitutes for preschoolers must be unflavored.

Certain brands of soy milk are the only nondairy milk products that meet the USDA's nutrition standards for fluid milk substitutes. Almond milk, rice milk, and other nondairy milk products do not currently meet these standards.

In addition to meeting the USDA's nutrition standards, any nondairy milk substitutes sold in public schools, either as part of school meals or a la carte, must meet the state beverage requirements of C.G.S. [Section 10-221q](#). The state beverage requirements do not apply to private schools or RCCIs.

C.G.S. Section 10-221q requires that nondairy milk substitutes cannot contain artificial sweeteners, and cannot contain more than 4 grams of sugar per ounce, more than 35 percent of calories from fat, and more than 10 percent of calories from saturated fat. Nondairy milk substitutes that do not meet the USDA's nutrition standards and the state beverage requirements of C.G.S. Section 10-221q cannot be served as part of reimbursable meals and ASP snacks, or sold a la carte in public schools. List 17 on the CSDE's [List of Acceptable Foods and Beverages](#) webpage includes products that meet the USDA and state requirements.

For children without disabilities, SFAs cannot substitute nondairy beverages that do not comply with the USDA's nutrition standards for fluid milk substitutes and C.G.S. Section 10-221q, even with a medical statement signed by a recognized medical authority. A noncompliant nondairy beverage cannot replace milk unless the child has a medically documented disability that specifically requires it.

Table 4. USDA's nutrition standards for fluid milk substitutes

Minimum nutrients per cup (8 fluid ounces)	
Calcium	276 milligrams (mg) or 30% Daily Value (DV) ¹
Protein	8 grams (g)
Vitamin A	500 international units (IU) or 10% DV
Vitamin D	100 IU or 25% DV
Magnesium	24 mg or 6% DV
Phosphorus	222 mg or 20% DV ¹
Potassium	349 mg or 10% DV ¹
Riboflavin	0.44 mg or 25% DV ¹
Vitamin B12	1.1 micrograms (mcg) or 20% DV ¹
¹ The FDA labeling laws require manufacturers to round nutrition values to the nearest 5 percent. The unrounded minimum DV is 27.6% for calcium, 22.2% for phosphorus, 9.97% for potassium, 25.88% for riboflavin, and 18.33% for vitamin B12. Source: <i>How to Determine if a Soy-Based Beverage Meets the Nutrient Requirements to Qualify as an Authorized Milk Substitute in WTC</i> , USDA Food and Nutrition Services (FNS) Office of Research, Nutrition, and Analysis (ORNA), 2006.	

Identifying acceptable milk substitutes

The Nutrition Facts label does not usually include all of the nutrients required to identify a product's compliance with the USDA's nutrition standards for fluid milk substitutes. If the Nutrition Facts label is missing any of the required nutrient information, SFAs must contact the manufacturer to obtain a product specification sheet that documents the product's compliance with each of the nine nutrients.



SFAs can use the USDA's protein standard to screen nondairy products and determine if they might meet the USDA's nutrition standards. The USDA requires that fluid milk substitutes contain 8 grams of protein per cup (8 fluid ounces). If the product's Nutrition Facts label lists less than 8 grams of protein per 1-cup serving, the product does not meet the USDA's nutrition standards.

3 | Children without Disabilities

If the product's Nutrition Facts label lists at least 8 grams of protein per 1-cup serving, the product might comply with the USDA's nutrition standards. SFAs must obtain additional information from the manufacturer to determine if the product also meets the standards for calcium, vitamin A, vitamin D, magnesium, phosphorus, potassium, riboflavin, and vitamin B12. SFAs are encouraged to submit this information to the CSDE so that new acceptable products can be added to the CSDE's [List of Acceptable Foods and Beverages](#) webpage. For more information, see the CSDE's handout, *Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs*.

Variety of milk substitutes

SFAs may choose how many types of milk substitutes to offer to children without disabilities. If more than one substitute is offered, the SFA must inform all parents or guardians of the options, and allow all parents or guardians to choose one. For a reimbursable meal, all milk substitute options offered by the SFA must be low-fat unflavored or fat-free unflavored or flavored lactose-reduced or lactose-free milk, or a nondairy beverage that meets the USDA's nutrition standards for fluid milk substitutes. For more information, see "[Lactose-reduced and lactose-free milk](#)" and [table 4](#) in this section.

Availability of milk substitutes

If a SFA chooses to make allowable milk substitutes available, they must be available for all children when requested by parents or guardians. If a SFA grants a request for any substitute, then all requests for that substitute must be granted. For example, if a SFA chooses to provide an allowable brand of soy milk at a parent's request, then an allowable brand of soy milk must be available to all children whose parents or guardians make any request for fluid milk substitutes. All soy milk products must meet the USDA's nutrition standards for fluid milk substitutes (see [table 4](#)) and the beverage requirements of state statute.

A la carte sales of milk substitutes

While SFAs may allow students to purchase an allowable soy milk separately from reimbursable meals, allowable soy milk cannot be substituted for regular milk in a reimbursable meal unless the SFA has a written request from the parent or guardian. If a SFA serves an allowable soy milk in the milk cooler and a student takes soy milk in place of regular milk with the reimbursable meal, the soy milk does not count as the USDA's meal pattern component for fluid milk unless the SFA has a written parent or guardian request on file. All milk substitutes sold a la carte must meet the USDA's nutrition standards for fluid milk substitutes (see [table 4](#)).

Other beverages

For children whose dietary restriction is not related to a disability, SFAs cannot substitute any other beverages for milk, even with a medical statement signed by a recognized medical authority. Examples of beverages that cannot be substituted for milk include:

- juice;
- water;
- nondairy milk substitutes that do not comply with the USDA's nutrition standards for fluid milk substitutes (see [table 4](#) in section 3), such as almond milk, rice milk, and cashew milk;
- nutrition supplement beverages, such as Abbott's Pediasure; and
- powdered milk beverages, such as Nestle's NIDO.



Meals and ASP snacks for children without disabilities are not reimbursable if they contain any of these beverages in place of milk. If the SFA chooses to make milk substitutes available, they must include at least one choice of either lactose-reduced or lactose-free milk, or an allowable nondairy beverage that meets the USDA's nutrition standards for milk substitutes (see table 4). These are the only two options allowed for milk substitutes for children without disabilities.

Table 5 shows examples of acceptable and unacceptable milk substitutes in the NSLP, SBP, and ASP meal patterns for children without disabilities in grades K-12. Table 6 shows examples of acceptable and unacceptable milk substitutes in the NSLP, SBP, and ASP preschool meal patterns for children ages 2-4 without disabilities.

Table 5. Milk substitutes for children without disabilities in grades K-12 in the NSLP, SBP, and ASP

SFA offers	Is this an allowable milk substitution?
Whole milk, unflavored or flavored, (including lactose-free or lactose-reduced milk)	No. Whole milk can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
Reduced-fat (2%) milk, unflavored or flavored (including lactose-free or lactose-reduced milk)	No. Reduced-fat milk can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
Low-fat (1%) lactose-free or lactose-reduced milk, unflavored or flavored	Yes. Lactose-free and lactose-reduced low-fat milk credit the same as regular low-fat milk in the meal patterns for school nutrition programs.
Fat-free lactose-free or lactose-reduced milk, unflavored or flavored	Yes. Lactose-free and lactose-reduced low-fat milk credit the same as regular fat-free milk in the meal patterns for school nutrition programs.
Nondairy milk substitute (unflavored or flavored) that does not meet the USDA's nutrition standards, such as rice or almond milk	No. All nondairy milk substitutes must meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q. ¹
Nondairy milk substitute (unflavored or flavored) that does not meet the state beverage requirements of C.G.S. Section 10-221q, such as rice or almond milk	No. All nondairy milk substitutes must meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q. ¹

**Table 5. Milk substitutes for children without disabilities
in grades K-12 in the NSLP, SBP, and ASP, *continued***

SFA offers	Is this an allowable milk substitution?
Nondairy milk substitute (unflavored or flavored) that meets the USDA's nutrition standards and the state beverage requirements of C.G.S. Section 10-221q, such as certain brands of soy milk	Yes. Nondairy milk substitutes that meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q may substitute for milk in the meal patterns for school nutrition programs.
Juice	No. Juice can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
Water	No. Water can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
Nutrition supplement beverages	No. Nutrition supplement beverages can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
Powdered milk beverages	No. Powdered milk beverages can never substitute for low-fat or fat-free milk in the meal patterns for school nutrition programs, even with a medical statement signed by a recognized medical authority. ¹
¹ All beverages offered in reimbursable meals and ASP snacks for children without disabilities must comply with the USDA's meal patterns for school nutrition programs.	

Table 6. Milk substitutes for ages 2-4 without disabilities in the NSLP, SBP, and ASP

SFA offers	Is this an allowable milk substitution?
Whole milk, unflavored or flavored, (including lactose-free or lactose-reduced milk)	No. Whole milk can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
Reduced-fat (2%) milk, unflavored or flavored (including lactose-free or lactose-reduced milk)	No. Reduced-fat milk can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
Low-fat (1%) lactose-free or lactose-reduced milk, unflavored	Yes. Unflavored lactose-free and lactose-reduced low-fat milk credit the same as regular unflavored low-fat milk in the preschool meal patterns.
Low-fat (1%) lactose-free or lactose-reduced milk, flavored	No. The USDA's preschool meal patterns require that low-fat milk must be unflavored, including lactose-free and lactose-reduced milk. ¹
Fat-free lactose-free or lactose-reduced milk, unflavored	Yes. Unflavored lactose-free and lactose-reduced fat-free milk credit the same as regular unflavored fat-free milk in the preschool meal patterns.
Fat-free lactose-free or lactose-reduced milk, flavored	No. The USDA's preschool meal patterns require that fat-free milk must be unflavored, including lactose-free and lactose-reduced milk. ¹
Nondairy milk substitute (unflavored or flavored) that does not meet the USDA's nutrition standards, such as rice or almond milk	No. All nondairy milk substitutes must meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q. ¹
Nondairy milk substitute (unflavored or flavored) that does not meet the state beverage requirements of C.G.S. Section 10-221q, such as rice or almond milk	No. All nondairy milk substitutes must meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q. ¹

**Table 6. Milk substitutes for ages 2-4 without disabilities
in the NSLP, SBP, and ASP, *continued***

Nondairy milk substitute (unflavored) that meets the USDA's nutrition standards and the state beverage requirements of C.G.S. Section 10-221q, such as certain brands of soy milk	Yes. Nondairy milk substitutes that meet the USDA's nutrition standards for milk substitutes (see table 4) and the state beverage requirements of C.G.S. Section 10-221q may substitute for milk in the preschool meal patterns.
Nondairy milk substitute (flavored) that meets the USDA's nutrition standards and the state beverage requirements of C.G.S. Section 10-221q, such as certain brands of soy milk	No. The USDA's preschool meal patterns require that allowable nondairy milk substitutes must be unflavored. ¹
Juice	No. Juice can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
Water	No. Water can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
Nutrition supplement beverages	No. Nutrition supplement beverages can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
Powdered milk beverages	No. Powdered milk beverages can never substitute for low-fat or fat-free milk in the preschool meal patterns, even with a medical statement signed by a recognized medical authority. ¹
¹ Optional meal modifications for children without disabilities must always meet the USDA's preschool meal patterns.	

4 — Modifications for Other Reasons

This section addresses meal modifications for reasons other than medical needs, including religion and personal food preferences. With the exception of sponsors of Jewish and Seventh-day Adventist institutions, SFAs are not required to make meal modifications for children whose dietary restrictions are based on individual food preferences that are not related to a disability, such as general health concerns and religious, ethnic, and moral reasons. However, the USDA encourages SFAs to provide a variety of foods that children can select, which helps to accommodate individual food preferences.

Religious Reasons

The USDA has granted institutions exemptions from the meal patterns when evidence shows that the variations are nutritionally sound and necessary to meet ethnic, religious, economic, or physical needs. The USDA's exemptions include sponsors of Jewish and Seventh-day Adventist institutions.



The USDA grants these exemptions for entities (schools, institutions, and sponsors), not individuals. Schools and institutions may choose to address the needs of individuals by substituting different food items within the same meal pattern component. For example, a child who does not eat pork for religious reasons could be served another meat/meat alternate (such as cheese, yogurt, or peanut butter), and still be provided a reimbursable meal.

Jewish sponsors

The USDA's [FNS Instruction 783-13 \(Rev. 3\)](#) summarizes the requirements for variations in meal patterns for Jewish schools, institutions, and sponsors. During the religious observance of Passover, Jewish institutions are exempt from the enrichment and whole grain-rich (WGR) requirements of the USDA's regulations. Jewish institutions may substitute unenriched matzo for WGR or enriched products only during that period. At all other times of the year, matzo served as the grains component must be WGR or enriched. For guidance on WGR and enriched grains, see the CSDE's handouts, [Crediting Whole Grains in the NSLP and SBP](#), [Crediting Enriched Grains in the NSLP and SBP](#), and [Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP](#).

4 | Other Modifications

The USDA also allows flexibilities for Jewish institutions regarding the meal pattern requirement to offer milk with all meals. Jewish institutions may choose from four alternative options. These options apply only to meals containing meat or poultry, when children do not have the opportunity to refuse milk or meat/poultry through OVS.

1. Serve an equal amount of an allowable nondairy milk substitute (for medical or special dietary needs) that is nutritionally equivalent to fluid milk. For information on the USDA's nutrition standards for milk substitutes, see table 4 in section 3.
2. Serve an equal amount of full-strength juice in place of milk with lunch (or supper in the CACFP At-risk Afterschool Program). When substituting juice for milk, juice cannot contribute to the meal pattern requirements for fruits or vegetables.
 - Schools and institutions operating five days per week may substitute juice for milk twice per week for lunches and twice per week for suppers, but no more than once each day.
 - Schools and institutions operating seven days per week may make three substitutions per week for lunches and three substitutions per week for suppers, but no more than once each day.
3. Serve milk at an appropriate time before or after the meal service period, in accordance with applicable Jewish Dietary Laws.
4. If applicable, serve the snack's juice component at breakfast, lunch, or supper, and serve the corresponding meal's milk component as part of the snack.

Milk must be offered or served in all other meals according to regulations, since Jewish Dietary Laws allow other meat alternates (such as fish, egg, beans and peas, nuts, seeds, and nut/seed butters) to be consumed with milk at the same meal.

Jewish institutions have the discretion to select one of the four options as an alternative to the standard regulatory meal requirements. For review and audit purposes, institutions electing to use these options must inform the CSDE in writing prior to implementation, and must maintain a record of which option they have chosen. For information on contacting the CSDE, see "[CSDE Contact Information](#)" at the beginning of this guide.

Jewish Dietary Laws also pose challenges to serving the dark green vegetable subgroup required in the NSLP. Jewish institutions facing this challenge may be exempt from the requirement to serve the dark green vegetable subgroup, but must serve the same total amount of vegetables. Vegetables served in place of dark green vegetables must come from the red/orange or beans/peas subgroups. The *Dietary Guidelines for Americans* indicates that the American diet does not include a sufficient amount of these two subgroups.

Seventh-day Adventist sponsors

Seventh-day Adventist institutions, like all other sponsors of the school nutrition programs, may use alternate protein products (APPs) such as vegetable burgers and other meatless entree items to meet the requirements for the meat/meat alternates component. The USDA allows the use of APPs to provide more flexibility in menu planning.



APPs are food ingredients that may be used alone or in combination with meat, poultry, or seafood. They are processed from soy or other vegetable protein sources and may be dehydrated granules, particles, or flakes. Some examples include soy flours, soy concentrates, soy isolates, whey protein concentrate, whey protein isolates, and casein. APPs may be used in the dry (nonhydrated), partially hydrated, or fully hydrated form.

Appendix A to [Part 210](#) of the NSLP regulations and [Part 220](#) of the SBP regulations requires that APPs must comply with specific criteria to credit toward the meat/meat alternates component of the USDA's meal patterns. The APP requirements are listed below.

1. The APP is processed so that some portion of the nonprotein constituents of the food is removed. (This refers to the manufacturing process for APPs.) APPs must be safe and suitable edible products produced from plant or animal sources.
2. The biological quality of the protein in the APP must be at least 80 percent that of casein (milk protein), determined by performing a Protein Digestibility Corrected Amino Acid Score (PDCAAS).
3. The APP contains at least 18 percent protein by weight when fully hydrated or formulated. ("When hydrated or formulated" refers to a dry APP and the amount of water, fat, oil, colors, flavors or any other substances that have been added.)

Menu planners cannot determine this information by reading the product's label. The USDA's Food Safety Inspection Service (FSIS) and the Food and Drug Administration's (FDA) labeling laws require manufacturers to list product ingredients, but percent labeling is voluntary. For example, the ingredients may list whey protein concentrate and hydrolyzed soy protein, but will not indicate the percentage of these protein ingredients by weight. Consequently, SFAs are responsible for obtaining documentation from the manufacturer for any APPs used to meet the requirements of the meat/meat alternates component.

The manufacturer can provide documentation of the USDA's three criteria for APPs in a variety of forms, such as a product specification sheet or a letter signed by a company official attesting the product meets the USDA's requirements. Products that have Child Nutrition (CN) labels provide information on how APPs credit toward the USDA's meal patterns.

4 | Other Modifications

For more information on crediting APPs, see the CSDE's handout, [Requirements for Alternate Protein Products](#), and the USDA's handout, [Questions and Answers on Alternate Protein Products](#). For information on CN labels, see the CSDE's handout, [Child Nutrition \(CN\) Labeling Program](#).

Vegetarians

With the exception of Seventh-day Adventist sponsors, the USDA's regulations do not require SFAs to make meal modifications for vegetarians. To receive USDA reimbursement, meals served to vegetarian children must meet the USDA's meal patterns. SFAs are encouraged to work with parents or guardians to provide foods that children can eat, while considering cost constraints and program logistics such as food service production capabilities.

With multiple lunch choices and OVS, SFAs can generally accommodate the preferences of vegetarian children. OVS allows children to decline a specific number of food components at breakfast and lunch (except for at least $\frac{1}{2}$ cup of fruits or vegetables), while still receiving a reimbursable meal.



SFAs can offer a variety of vegetarian choices each week, such as macaroni and cheese, spaghetti with tomato sauce and cheese wedge, red beans and rice, cheese pizza, vegetable bean soup, chili, grilled cheese sandwiches, cheese lasagna, bean tacos, and bean burritos. SFAs may also incorporate a variety of vegetable-based entree products in school menus, such as tofu, tempeh, and meatless entrees (such as hotdogs and vegetable burgers) that meet the USDA's specified criteria for APPs. For more information, see [“Seventh-day Adventist sponsors”](#) in this section.

If the menu includes only one lunch choice, SFAs can choose to offer vegetarian children a different food item from the same meal component. For example, SFAs can substitute a grilled cheese (meat/meat alternates component) sandwich on whole-grain bread (grains component) for a hamburger (meat/meat alternates component) on a whole-grain bun (grains component).

Note: OVS is a concept that applies to menu planning and the determination of reimbursable meals in the NSLP and SBP. OVS does not apply to the SMP or ASP, or to preschool meals in the NSLP and SBP. OVS allows students to decline a certain number of food components in the meal (except for at least $\frac{1}{2}$ cup of fruits or vegetables), reducing food waste and food costs, and allowing students to select the foods they prefer to eat. At lunch, OVS must be implemented in senior high schools but is optional for all other grades. At breakfast, OVS is optional for all grade levels. SFAs that choose to implement OVS can provide significantly more flexibility in meeting students' dietary preferences. For more information, visit the CSDE's [OVS](#) webpage.

Food Preferences

The USDA's regulations for school nutrition programs do not require SFAs to make meal modifications based on the food choices or personal preferences of a family or child. An example is parents who prefer that their children eat a gluten-free diet or organic foods because they believe it is healthier. Personal food preferences are not disabilities and do not require meal modifications. For more information, see "[Food Preference versus Disability](#)" in section 2.

SFAs may choose, but are not required, to accommodate children's personal food preferences on a case-by-case basis. Meal modifications for personal food preferences must comply with the USDA's meal patterns. For grades K-12 in the NSLP and SBP, meal modifications for personal food preferences must also meet the weekly dietary specifications, and are included in the CSDE's nutrient analysis of school menus, when a nutrient analysis is required as part of the Administrative Review of school nutrition programs.



The CSDE encourages SFAs to accommodate student's personal food preferences by offering a variety of menu options for students and implementing OVS. Providing multiple choices and implementing OVS allow more flexibility in accommodating students' personal food preferences. For more information, visit the CSDE's [OVS](#) webpage.

Procured Meals

SFAs must always ensure that any benefits available to the general school population are equally available to children with disabilities. Federal regulations specifically prohibit disability discrimination through contractual means, included vended contracts. SFAs must make accommodations for children with disabilities, regardless of whether the school district:

- operates the food service program;
- contracts with a food service management company (FSMC); or
- purchases vended meals.

When a FSMC operates the school nutrition program or the SFA obtains meals and ASP snacks from a vendor, the LEA must address the issue of meal modifications. The CSDE recommends that the contract developed with the FSMC or vendor specifies the SFA's requirements for meal modifications. SFAs that do not have any need for meal modifications at the time a bid is prepared should still include sufficient information in the bid to ensure that the vendor is aware that meal modifications may be required during the term of the contract. The SFA, not the FSMC or vendor, is ultimately responsible for complying with the USDA's

4 | Other Modifications

regulations for school meals, including meal modifications for children whose disability restricts their diet.

For detailed guidance on contracting with FSMCs, see [USDA Memo SP 40-2016, CACFP 12-2016 and SFSP 14-2016: Updated Guidance: Contracting with Food Service Management Companies](#). For more information, visit the “School Nutrition Programs” section of the CSDE’s [Food Service Management Company Contracts](#) webpage.

Family-provided Foods

The regulations of [Connecticut Public Health Code \(PHC\) 19-13-B42](#) for food service establishments require that all food and drink must be from an approved source. SFAs sometimes receive requests to store, heat, and serve food items that a parent or guardian purchases off school premises and sends to school for their child’s consumption. SFAs should not accept any foods from home (including packaged foods) for food service personnel to either:

- heat and serve, such as frozen entree products; or
- store and serve, such as cold foods and beverages or packaged foods.

The Connecticut DPH advises local health departments that all foods in food service establishments, including school food service operations, must originate from inspected, regulated sources and be transported properly at required temperatures. Foods from a private home have not originated from an approved source. SFAs should not accept for service any food from an unregulated source, including foods from home or foods purchased by parents or guardians off school premises.



The school food service department cannot ensure the safety of food brought from home from either potential food allergens or microbial contamination. LEAs face potential liability issues if they serve foods that have not been:

- directly received from a regulated source, such as an approved food service vendor; or
- stored, cooked, and served by trained school food service personnel in the cafeteria under the direction of a qualified food operator (QFO).

Connecticut PHC Section 19-13-B42(s)(4) requires at least one QFO, who is in a supervisory position, and a designated alternate person to be in charge at all times when the QFO cannot be present, in each food service establishment that prepares and/or serves exposed potentially hazardous foods prepared using hot processes. Each local health jurisdiction is responsible for classifying its local food service establishments.

A QFO is a food service professional in a full-time supervisory capacity on site who has demonstrated knowledge in the safe preparation and service of food, as defined by DPH regulations. The QFO's responsibilities include operating the food service establishment in compliance with all the provisions of Public Health Code 19-13-B42; training food preparation personnel in safe food preparation practices; maintaining written documentation of training; and directing and inspecting the performance of food service workers. For more information, see the CSDE's handout, [*Qualified Food Operator \(QFO\) Responsibilities for Connecticut Child Nutrition Programs*](#).

Note: The QFO requirements will be changing. During the 2017 Connecticut legislative session, [Senate Bill 901](#) was passed to adopt the FDA Food Code. The new code will replace the following current food regulations: 19-13-B40, 19-13-B42, 19-13-B48, and 19-13-B49. [Public Act 18-168](#) (approved June 13, 2018) included language that extends the date for adoption of the FDA Food Code to "Not later than January 1, 2019." However, the state regulations to implement the FDA Food Code are still in the regulation review process, and were not approved by January 1, 2019. Therefore, as of January 1, 2019, the current food regulations (19-13-B42, 19-13-B40, 19-13-B48, and 19-13-B49) are still in effect and are enforceable by local certified food inspectors, until the state regulations are approved. SFAs should contact their [local health department](#) for more information.

For information and resources on food safety, visit the CSDE's [Food Safety for Child Nutrition Programs](#) webpage.



5 — Policies and Procedures

LEAs must comply with federal and state laws for developing and implementing written policies and procedures for special diets. The USDA's regulations require LEAs to develop and implement a procedural safeguards process. State law requires public schools to develop and implement a plan to manage students with life-threatening food allergies. The CSDE recommends that LEAs develop a written policy and standard operating procedures (SOPs) for meal modifications in the school nutrition programs. This section summarizes these requirements and recommendations.

Procedural Safeguards

The USDA's regulations ([7 CFR 15b.25](#)) require LEAs to establish a procedural safeguards process that provides notice and information to parents and guardians regarding how to request a reasonable meal modification and their procedural rights ([7 CFR 15b.6\(b\)](#)) for grievance procedures. These procedures include the right to:

- file a grievance if they believe a violation has occurred regarding the request for a reasonable modification;
- receive a prompt and equitable resolution of the grievance;
- request and participate in an impartial hearing to resolve their grievances;
- be represented by counsel at the hearing;
- examine the record; and
- receive notice of the final decision and a procedure for review, i.e., the right to appeal the hearing's decision.

LEAs must work with school food service personnel to implement procedures for parents and guardians to request meal modifications for children with disabilities and to resolve grievances. LEAs may fulfill this requirement by using existing procedures to address requests to accommodate students with disabilities in the classroom, in compliance with Section 504 or the IDEA.

At a minimum, the LEA must notify parents and guardians of the process for requesting meal modifications to accommodate a child's disability, and arrange for an impartial hearing process to resolve grievances related to requests for meal modifications based on a disability. The hearing process must include the opportunity for the child's parent or guardian to participate, be represented by counsel, and examine the record. It must also include notice of the final decision and a procedure for review.

LEAs employing at least 15 individuals must ensure their procedural safeguards process provides for a prompt and equitable resolution of grievances, and must designate at least one person to coordinate compliance with disability requirements. This individual is often referred to as the Section 504 Coordinator. In many cases, the Section 504 Coordinator is responsible for addressing requests for accommodations in the school in general, and may also be responsible for ensuring compliance with disability requirements related to meals and the meal service.

LEAs are not required to have a separate 504 Coordinator who is only responsible for meal modifications. However, LEAs should ensure that school food service personnel understand the procedures for handling requests for meal modifications and know how to contact the Section 504 Coordinator.

For a summary of the procedural safeguards, see the CSDE's handout, [*Requirements for Procedural Safeguards for Meal Modifications in School Nutrition Programs*](#).

Food Allergy Management Plan

[Section 10-212c](#) of the Connecticut General Statutes requires that public schools develop and implement a plan to manage students with life-threatening food allergies. The statute also specifies that schools should base the plan on the CSDE's publication, [*Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools*](#), and include the development of an IHCP for every student with life-threatening food allergies, regardless of the child's age.

SFAs in public schools should be familiar with their district's food allergy management plan and implement procedures that are consistent with that plan. School health services and food services should collaborate on the implementation of all food allergy management plans.



Policy for Meal Modifications

In addition to the requirements for procedural safeguards and food allergy management plans, the CDSE strongly encourages LEAs to develop a written policy addressing meal modifications for school nutrition programs. The policy should be integrated with the LEA's procedural safeguards process and food allergy management plan, and developed in collaboration with school health services and administrators. Written policies are important because they:

- provide clear guidelines for students, families, and school staff;
- ensure consistent practices in all schools and among all staff;
- document compliance with federal and state requirements and best practices;
- educate families regarding school practices and procedures;
- provide a basis to evaluate program activities and staff; and
- demonstrate the LEA's commitment to children's health and well-being.

Policies are an important tool to notify the school community (including school administrators, school staff, and families) of the availability of meal modifications, and explain applicable requirements and procedures, including:

- the federal requirements to ensure that modified meals and ASP snacks are reimbursable;
- the process for parents or guardians to request meal modifications;
- how to submit the medical statement and supporting documentation, such as diet plans;
- maintaining appropriate documentation and ensuring that the dietary information on file is current;
- SOPs for meal modifications, e.g., preparing foods for different types of special diets and cleaning procedures for preventing food allergen contamination;
- communication procedures among school personnel (such as the school nurse and school food service staff), and between schools and parents or guardians, to ensure that everyone is aware of each child's dietary needs and specific accommodations, as indicated on the child's medical statement (or Section 504 plan or IEP, if applicable);
- monitoring to ensure that meal modifications are appropriate and meet each child's individual dietary needs; and
- the LEA's procedural safeguards process. For more information, see "[Procedural Safeguards](#)" in this section.

Since meal modifications are only required for whose disability restricts their diet, SFAs will make decisions regarding meal modifications for children without disabilities. The written policy should address how the SFA will handle these meal modifications and identify any local procedures.

Standard operating procedures (SOPs)

SOPs are detailed explanations of how to implement a policy through specific practices or tasks. They standardize the process and provide step-by-step instructions that enable everyone to perform the task in a consistent manner. This ensures that all school staff follows the same procedures each time. Potential SOPs for meal modifications include:

- preparing foods for different types of special diets, such as texture modifications, food allergies, celiac disease, and diabetes;
- reviewing menus, reading food labels, and making nutrition information available to students, families, school nurses, and others as needed;
- cleaning to prevent cross-contact of possible allergens;
- handwashing to prevent cross-contact of possible food allergens;
- ensuring that school food service personnel, school nurses, and other appropriate school staff regularly communicate and collaborate regarding the planning and implementation of meal modifications for children whose disability restricts their diet;
- obtaining consultation services (such as a registered dietitian), as needed, to plan meals and ASP snacks for children whose disability restricts their diet; and
- training for school food service staff (including substitutes), and all appropriate school staff, involved with planning, preparing, and serving school meals and ASP snacks.

The resources below provide examples of SOPs.

- Preparation of Foods with Potential to Cause Allergic Reaction: Standard Operating Procedure (Wisconsin Department of Public Instruction):
https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sop_allg.doc
- Standard Operating Procedure: Handling Students Identified with Severe Food Allergy or Anaphylaxis (South Windsor Public Schools):
http://www.southwindsorschools.org/UserFiles/Servers/Server_239916/File/Departments/Food%20Services%20Chartwells/School%20Lunch%20Policies%20Procedures%20and%20Forms/SOP_on_Handling_students_Identified_with_Severe_Food_Allergy_or_Anaphylaxis_8-2013.pdf
- Food Safety SOPs (Institute of Child Nutrition):
<https://theicn.org/icn-resources-a-z/standard-operating-procedures/>
- Standard Operating Procedure (SOP): Serving Safe Food to Students with Food Allergies (ICN):
<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105719/serving-safe-food-to-students-with-food-allergies-3.docx>

- Standard Operating Procedures (SOPs): Washing Hands (ICN):
<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105741/washing-hands.docx>
- “Standard Operating Procedures” in the CSDE’s Food Safety Resource List:
<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesFoodSafety.pdf>

Strategies for policy development

The strategies below assist LEAs with developing a policy for meal modifications in the school nutrition programs. Priority areas include assessing current operations, developing SOPs, providing professional development, ensuring consistent communication, and monitoring implementation.

- Identify the personnel and resources needed for planning, developing, implementing, and evaluating the policy and SOPs for meal modifications.
- Conduct a self-assessment of the LEA’s current policies, practices, and procedures for modifications to school meals. The CSDE’s document, *Self-assessment of Local Practices for Special Diets in School Nutrition Programs*, can assist LEAs with this process.
- Identify the essential practices to implement in school food services and school health services, and determine where SOPs are necessary.
- Develop an action plan to address the practices needing attention, as identified by the LEA’s completed self-assessment. When developing action plans for policy and SOPs, start with the most important practices. The CSDE’s action planning form and sample action plans can assist with this process.
 - Action Planning Form:
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPlan.doc>
 - Sample Action Plan: Developing District Policy for Meal Modifications in School Nutrition Programs:
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPolicySpecialDiets.pdf>
 - Sample Action Plan: Promoting District Policy for Meal Modifications in School Nutrition Programs:
<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPromoteSpecialDiets.pdf>

5 | Policies and Procedures

- Develop SOPs by writing down the actual steps taken when performing the specific task. When using sample SOPs from organizations or other schools, be sure to customize the information so it is specific to the local program.
- Identify the training needs of school staff, and appropriate professional development on meal modifications for children with special dietary needs. Provide annual and ongoing training for school food service personnel, school health services personnel, and other school staff, as appropriate. For more information, see “[Staff Training](#)” in this section.
- Identify effective communication strategies between the school food service director, school food service personnel, nurse supervisor, nurses, teachers, students, parents or guardians, school staff, and administrators to ensure that everyone is aware of the LEA’s policy and SOPs for meal modifications. Incorporate these strategies into the SOPs, and provide staff training and guidance on how to implement them.
- Implement monitoring procedures to ensure that meal modifications are reasonable, appropriate, and meet each child’s specific dietary needs; and that all staff consistently follow the LEA’s policy and SOPs for meal modifications. Review the LEA’s policy and SOPs for meal modifications at least annually, and make changes as needed.

Staff Training

School food service personnel who are appropriately trained in nutrition, the USDA meal pattern requirements, food preparation techniques, meal modifications, and food safety are better prepared to provide nutritious and safe meals. Training helps school food service personnel understand their responsibilities and be successful in their jobs. Motivation is increased when employees understand program goals and the tasks required to achieve those goals. Training also instills a sense of positive self-esteem through improved professional competency.

SFAs must provide appropriate job-specific training for all employees whose responsibilities include duties related to the operation of school nutrition programs. For example, school food service staff who modify meals for students with disabilities need appropriate training to ensure they perform their jobs effectively and in compliance with the USDA’s regulations. The CSDE strongly recommends that SFAs include regular training on meal modifications. For training resources on special diets, see the CSDE’s presentation, [Requirements for Meal Modifications in School Nutrition Programs](#), and visit the “[Related Resources](#)” section of the CSDE’s Special Diets in School Nutrition Programs webpage. For meal pattern training resources, visit the CSDE’s [Meal Pattern Training for School Nutrition Programs](#) webpage.

Appropriate training is especially critical for the effective management of life-threatening food allergies. School food service personnel require training on how to read food labels and identify potential allergens in processed foods. They also need to know how to avoid cross-contact with potential allergens during food preparation, service, and cleaning. All school staff need training on identifying the symptoms of an allergic reaction and how to respond in an emergency. For training resources on food allergies, see the CSDE’s presentation, *Managing Food Allergies in the Cafeteria: The Role of School Food Service Managers and Staff*, and visit the “[Related Resources](#)” section of the CSDE’s Special Diets in School Nutrition Programs webpage. For more information and resources on food allergies, see “[Food Allergy](#)” in section 2.

The USDA also requires annual civil rights training for all staff interacting with applicants or participants of the school nutrition programs. The USDA’s civil rights requirements address meal modifications for students with disabilities. SFAs should use the CSDE’s PowerPoint presentation, *Civil Rights: Your Responsibilities in the School Nutrition Programs PowerPoint Presentation*, to provide civil rights training. This presentation is available under “School Nutrition Programs” on the CSDE’s [Civil Rights for Child Nutrition Programs](#) webpage.

SFAs must log all staff training on the SFA’s annual professional standards tracking log. For more information, see the CSDE’s *Professional Standards Tracker Log*, and the USDA’s publication, *Guide to Professional Standards for School Nutrition Programs*, and visit the CSDE’s [Professional Standards for School Nutrition Professionals](#) webpage.



6 — Resources

This section includes links to federal and state regulations, policy memoranda, websites, and the CSDE's guides, resource lists, forms and handouts. All forms and handouts for meal modifications are available on the CSDE's [Special Diets in School Nutrition Programs](#) website.

CSDE Forms and Handouts

Action Planning Form:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPlan.doc>

Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MilkSubstitutesSchools.pdf>

Child Nutrition (CN) Labeling Program:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CNlabel.pdf>.

Medical Statement for Special Diets in School Nutrition Programs (English):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNP.pdf>

Medical Statement for Special Diets in School Nutrition Programs (Spanish):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNP_Spanish.pdf

Guidance and Instructions: Medical Statement for Special Diets in School Nutrition Programs (English):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNPinstr.pdf>.

Guidance and Instructions: Medical Statement for Special Diets in School Nutrition Programs (Spanish):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MedicalStatementSNPinstr_Spanish.pdf.

Qualified Food Operator (QFO) Responsibilities for Connecticut Child Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/FoodSafe/QFO.pdf>

Requirements for Meal Modifications in School Nutrition Programs (CSDE Presentation):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/SpecialDietsPresentation.pdf>

Requirements for Procedural Safeguards for Meal Modifications in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ProceduralSafeguardsSNP.pdf>

Sample Action Plan: Developing District Policy for Meal Modifications in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPolicySpecialDiets.pdf>

Sample Action Plan: Promoting District Policy for Meal Modifications in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/ActionPromoteSpecialDiets.pdf>

Self-assessment of Local Practices for Special Diets in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/AssessmentSpecialDietsSchools.pdf>

Summary of Requirements for Accommodating Special Diets in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/SpecialDietsChart.pdf>

CSDE Guides

Accommodating Special Diets in School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/SpecialDietsGuide.pdf>

Afterschool Snack Program Handbook:

<https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASPHandbook.pdf>

Guidelines for Feeding and Swallowing Programs in Schools:

https://portal.ct.gov/-/media/SDE/Special-Education/feeding_and_swallowing.pdf

Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools:

<https://portal.ct.gov/SDE/Publications/Managing-Life-Threatening-Food-Allergies-in-Connecticut-Schools>

Menu Planning Guide for Preschool Meals in the NSLP and SBP:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/MPGpreschool.pdf>

Menu Planning Guide for School Meals:

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

Offer versus Serve Guide for School Meals:

<https://portal.ct.gov/SDE/Nutrition/-/media/SDE/Nutrition/NSLP/OVS/OVSGuide.pdf>

CSDE Resource Lists

The CSDE resource lists are available on the CSDE's [Resources for Child Nutrition Programs](#) webpage.

Child Nutrition Programs Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesChildNutritionPrograms.pdf>

Competitive Foods Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesCompetitiveFoods.pdf>

Dietary Guidelines and Nutrition Information Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesDietaryGuidelines.pdf>

Food Safety Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesFoodSafety.pdf>

Health and Achievement Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesAchievement.pdf>

Menu Planning and Food Production Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesMenuPlanning.pdf>

Nutrition Education Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesNutritionEducation.pdf>

Physical Activity and Physical Education Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesPhysicalActivity.pdf>

Promoting Healthy Weight Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesHealthyWeight.pdf>

Special Diets Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesSpecialDiets.pdf>

Wellness Policies for Schools and Child Care Resource List:

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesWellnessPolicy.pdf>

Nondiscrimination Legislation

Americans with Disabilities Act (ADA) Amendments Act of 2008 (P.L. 110-325):

<https://www.ada.gov/pubs/ada.htm>

Americans with Disabilities Act (ADA) Amendments Act of 2008 Final rule: Amendment of Americans with Disabilities Act Title II and Title III Regulations to Implement ADA Amendments Act of 2008 (28 CFR Parts 35 and 36):

<https://www.ada.gov/regs2016/adaaa.html>

Americans with Disabilities Act (ADA) Final Rule: Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities (28 CFR Part 36) (Implementing regulation for Title III of the Americans with Disabilities Act (ADA)):

https://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.pdf

Americans with Disabilities Act (ADA):

<https://www.ada.gov/>

Americans with Disabilities Act (ADA): The Americans with Disabilities Act of 1990 and Revised ADA Regulations Implementing Title II and Title III (U.S. Department of Justice website): https://www.ada.gov/2010_regs.htm

Americans with Disabilities Act of 1990 (ADA) and the ADA Amendments Act of 2008 (Public Law 110-325):

<https://www.ada.gov/pubs/ada.htm>

Civil Rights (U.S. Department of Health & Human Services, Office for Civil Rights):

<https://www.hhs.gov/civil-rights/for-individuals/disability/index.html>

Code of Federal Regulations 7CFR15b.3 Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving Federal Financial Assistance (USDA):

<https://www.gpo.gov/fdsys/pkg/CFR-2003-title7-vol1/xml/CFR-2003-title7-vol1-sec15b-3.xml>

CSDE Circular Letter C-9: Section 504 of the Rehabilitation Act of 1975: Procedural Safeguards: <https://portal.ct.gov/-/media/SDE/Circular-Letters/circ00-01/c9.pdf>

Family Educational Rights and Privacy Act (FERPA) (U.S. Department of Education):

<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Individuals with Disabilities Education Act (IDEA):

<https://www.gpo.gov/fdsys/pkg/PLAW-108publ446/html/PLAW-108publ446.htm>

Individuals with Disabilities Education Act (IDEA):

http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=108_cong_public_laws&docid=f:publ446.108

Individuals with Disabilities Education Act (U.S. Department of Education):

<https://sites.ed.gov/idea/>

Know the Rights That Protect Individuals with Disabilities from Discrimination (U.S. Department of Health & Human Services Office for Civil Rights):

<https://www.hhs.gov/sites/default/files/knowyourrights504adafactsheet.pdf>

Section 504 of the Rehabilitation Act of 1973:

<https://www.hhs.gov/sites/default/files/knowyourrights504adafactsheet.pdf>

U.S. Department of Education Office of Special Education Programs:

<https://www2.ed.gov/about/offices/list/osep/index.html>

USDA Nondiscrimination Regulations (7 CFR 15b): Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance):

<https://www.gpo.gov/fdsys/granule/CFR-2010-title7-vol1/CFR-2010-title7-vol1-part15b>

Your Rights Under Section 504 of the Rehabilitation Act (U.S. Department of Health & Human Services, Office for Civil Rights):

<https://www.hhs.gov/sites/default/files/ocr/civilrights/resources/factsheets/504.pdf>

Child Nutrition Programs

Afterschool Snack Program (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Afterschool-Snack-Program>

Afterschool Snack Program (USDA):

<https://www.fns.usda.gov/school-meals/afterschool-snacks>

Beverage Requirements (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Beverage-Requirements>

Child Nutrition (CN) Labeling (USDA):

<https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program>

Child Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Child-Nutrition-Programs>

Connecticut Department of Public Health Food Protection Program:

<http://www.portal.ct.gov/DPH/Food-Protection-Program/Main-Page>

Connecticut Nutrition Standards (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Connecticut-Nutrition-Standards>

Crediting Foods for Grades K-12 in School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs>

Crediting Foods for Preschoolers in School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Documents>

Healthy Food Certification (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification>

Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296):

<https://www.fns.usda.gov/school-meals/healthy-hunger-free-kids-act>

Health Insurance Portability and Accountability Act of 1996 (HIPAA) (U.S. Department of Health and Human Services):

<https://www.hhs.gov/hipaa/index.html>

Laws and Regulations for Child Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Laws-and-Regulations-for-Child-Nutrition-Programs>

List of Acceptable Foods and Beverages (CSDE):

<https://portal.ct.gov/SDE/Nutrition/List-of-Acceptable-Foods-and-Beverages>

Manuals and Guides for Child Nutrition Programs:

<https://portal.ct.gov/SDE/Nutrition/Manuals-and-Guides-for-Child-Nutrition-Programs>

Meal Pattern Training Materials (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs>

Menu Planning for Child Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning>

National School Lunch Program (CSDE):

<https://portal.ct.gov/SDE/Nutrition/National-School-Lunch-Program>

National School Lunch Program (USDA):

<https://www.fns.usda.gov/nslp/national-school-lunch-program-nslp>

Nutrition Education (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Nutrition-Education>

Nutrition Standards for School Meals (USDA):

<https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>

Operational Memos for School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Lists/Operational-Memoranda-for-School-Nutrition-Programs>

Policies on Special Diets (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs/What-Next>

Production Records for School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Production-Records-for-School-Nutrition-Programs>

Program Guidance for School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Program-Guidance-School-Nutrition-Programs>

Regulations for School Meals (USDA):

<https://www.fns.usda.gov/school-meals/program-legislation-regulations>

Requirements for School Foods and Beverages (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Requirements-for-School-Foods-and-Beverages>

Resources for Child Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Resources-for-Child-Nutrition-Programs>

School Breakfast Program (CSDE):

<https://portal.ct.gov/SDE/Nutrition/School-Breakfast-Program>

School Nursing (CSDE):

<https://portal.ct.gov/SDE/School-Nursing/School-Nursing>

School Wellness Policies (CSDE):

<https://portal.ct.gov/SDE/Nutrition/School-Wellness-Policies>

Special Diets in School Nutrition Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs>

USDA Policy Memoranda for the CACFP (USDA):

<https://www.fns.usda.gov/cacfp/policy>

USDA Policy Memoranda for School Meals (USDA):

<https://www.fns.usda.gov/school-meals/policy>

Regulations and Policy

Accommodating Children with Disabilities in the School Meal Programs (USDA):

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf>

Connecticut General Statutes Section 10-221q (Sale of Beverages):

https://www.cga.ct.gov/current/pub/chap_170.htm#sec_10-221q

Connecticut Public Health Code 19-13-B42: Sanitation of Places Dispensing Foods or Beverages (DPH):

<https://eregulations.ct.gov/eRegsPortal/Browse/getDocument?guid=%7BF2EAB579-78B9-43A1-8B73-7ACE5B2DC9DD%7D>

CSDE Operational Memorandum No. 22-15: Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2015/OM22-15.pdf>

CSDE Operational Memorandum No. 28-13: Variations in Meal Requirements for Religious Reasons: Jewish Schools, Institutions and Sponsors:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2013/OM28-13.pdf>

Final Rule “Nutrition Standards in the National School Lunch and School Breakfast Programs,” Questions & Answers for Program Operators (USDA):

<http://www.fns.usda.gov/qas-final-rule-nutrition-standards-national-school-lunch-and-school-breakfast-programs>

Final Rule on Fluid Milk Substitutions in the School Nutrition Programs (73 FR 52903) (USDA): <http://edocket.access.gpo.gov/2008/pdf/E8-21293.pdf>

FNS Instruction 783-13, Revision 3: Variations in Meal Requirements for Religious Reasons: Jewish Schools, Institutions and Sponsors:

<https://portal.ct.gov/-/media/SDE/Nutrition/FNSinstruction/783-13.pdf>

Guidelines for Cumulative Health Records Guidelines (CSDE):

https://portal.ct.gov/-/media/SDE/School-Nursing/Publications/CHR_guidelines.pdf

Nutrient Analysis Protocols: How to Analyze Menus for USDA’s School Meals Programs (USDA):

<http://healthymeals.nal.usda.gov/hsmrs/Software/For%20Web/NAPManual.pdf>

USDA Memo SP 40-2017: 2017 Edition: Accommodating Children with Disabilities in the School Meal Programs:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017os.pdf>

USDA Memo SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As):

<https://www.fns.usda.gov/school-meals/accommodating-disabilities-school-meal-programs-guidance-and-qas>

USDA Memo SP 59-2016: Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs:
<https://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>

USDA Memo SP 32-2015, CACFP 13-2015 and 13 SFSP 15-2015: Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs:
<https://www.fns.usda.gov/statements-supporting-accommodations-children-disabilities-cnp>

USDA Memo SP 29-2011: Child Nutrition Reauthorization 2010: Nutrition Requirements for Fluid Milk:
<https://www.fns.usda.gov/nutrition-requirements-fluid-milk>

USDA Memo SP07-2010, CACFP 04-2010 and SFSP 05-2010: Q&As - Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability):
<https://www.fns.usda.gov/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability>

USDA Memo SP 02-2009: Final Fluid Milk Substitution Rule:
<https://www.fns.usda.gov/final-fluid-milk-substitution-rule>

Glossary

a la carte sales: Foods and beverages that are sold separately from reimbursable meals and ASP snacks in the USDA's school nutrition programs. A la carte items include, but are not limited to, foods and beverages sold in the cafeteria serving lines, a la carte lines, kiosks, vending machines, school stores, and snack bars located anywhere on school grounds.

Administrative Review: A periodic review of an institution's operations by the Connecticut State Department of Education to monitor performance and assess compliance with all USDA regulations. For more information, visit the CSDE's [Administrative Review for School Nutrition Programs](#) webpage.

advanced practice registered nurse (APRN): An individual who performs advanced level nursing practice activities that, by virtue of post-basic specialized education and experience, are appropriate to and may be performed by this profession. The APRN performs acts of diagnosis and treatment of alterations in health status and collaborates with a physician (licensed to practice medicine in Connecticut) to prescribe, dispense, and administer medical therapeutics and corrective measures. For more information, see [Section 20-87a](#) of the Connecticut General Statutes.

Afterschool Snack Program: The USDA's federally assisted snack program implemented through the National School Lunch Program (NSLP). The Afterschool Snack Program provides cash reimbursement to help schools serve snacks to children in afterschool activities aimed at promoting the health and well-being of children and youth. Schools must provide children with regularly scheduled activities in an organized, structured and supervised environment that includes educational or enrichment activities, e.g., mentoring/tutoring programs. Programs must meet state or local licensing requirements and health and safety standards. For more information, visit the CSDE's [Afterschool Snack Program](#) webpage.

alternate protein products (APP): APP are generally single ingredient powders that are added to foods. Some examples include soy flours, soy concentrates, soy isolates, whey protein concentrate, whey protein isolates and casein. APP include vegetable protein products. The USDA has specific requirements for the crediting of APP in Child Nutrition Programs. For more information, see the CSDE's handout, [Requirements for APP in the NSLP and SBP](#).

anaphylaxis: A sudden, severe allergic reaction occurring in allergic individuals after exposure to an allergen such as food, an insect sting or latex. Anaphylaxis involves various areas of the body simultaneously or causes difficulty breathing and swelling of the throat and tongue. In extreme cases, anaphylaxis can cause death.

Glossary

body mass index: A number calculated from a child's weight and height that is a reliable indicator of body fat for most children and teens. For children ages 2 through 19, the BMI number is plotted on the Centers for Disease Control and Prevention's (CDC) BMI-for-age growth charts (for either girls or boys) to obtain a percentile ranking. Percentiles are the most commonly used indicator to assess the size and growth patterns of individual children in the United States. BMI ranges for children and teens are defined so that they take into account normal differences in body fat between boys and girls and differences in body fat at various ages. For more information, visit the CDC's [About Child and Teen BMI](#) webpage.

celiac disease: An autoimmune digestive disease that damages the small intestine and interferes with absorption of nutrients from food. People who have celiac disease cannot tolerate gluten, a protein in wheat, rye and barley. For more information, visit the [National Digestive Diseases Information Clearinghouse](#) website.

Child and Adult Care Food Program (CACFP): The USDA's federally assisted meal program providing nutritious meals and snacks to children in child care centers, family day care homes and emergency shelters, and snacks and suppers to children participating in eligible at-risk afterschool care programs. The program also provides meals and snacks to adults who receive care in nonresidential adult day care centers. For more information, visit the USDA's [CACFP](#) webpage and the CSDE's [CACFP](#) webpage.

Child Nutrition (CN) label: A statement that clearly identifies the contribution of a food product toward the meal pattern requirements, based on the USDA's evaluation of the product's formulation. Products eligible for CN labeling include main dish entrees that contribute to the meat/meat alternates component of the meal pattern requirements, e.g., beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls, and breaded fish portions. The CN label may also indicate the contribution of other meal components that are part of these products. For more information, see the CSDE's handout, [Child Nutrition \(CN\) Labeling Program](#), and visit the USDA's [Child Nutrition \(CN\) Labeling](#) webpage.

Child Nutrition Programs: The USDA's federally funded programs that provide nutritious meals and snacks to children, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program, Seamless Summer Option (SSO) of the NSLP, Special Milk Program (SMP), Summer Food Service Program (SFSP), Fresh Fruit and Vegetable Program (FFVP) and Child and Adult Care Food Program (CACFP). The CACFP also provides nutritious meals and snacks to the frail elderly in adult day care centers. For more information, visit the CSDE's [Child Nutrition Programs](#) webpage.

competitive foods: Any foods and beverages sold to students anytime on school premises other than meals served through the USDA's school meal programs. Competitive food sales include, but are not limited to, cafeteria a la carte sales, vending machines, school stores and fundraisers. For more information, see "a la carte sales" in this section.

creditable food: A food or beverage that can be counted toward meeting the meal pattern requirements for a reimbursable meal or snack in the USDA’s Child Nutrition Programs. For information on crediting foods for grades K-12, see the CSDE’s [Crediting Foods for Grades K-12 in School Nutrition Programs](#) webpage. For information on crediting foods for preschoolers (ages 1-4), visit the “Documents/Forms” section of the CSDE’s [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

cross-contact: The transfer of allergen-containing ingredients to allergy-free food by hands, food-contact surfaces, sponges, cloth towels, or utensils.

Cumulative Health Record (CHR): The official student health record in Connecticut schools. The CHR is recognized as a formal part of an educational record and must be maintained as such. It provides a systematic way to organize the collection of student health information. For more information, see the CSDE’s publication, [Guidelines for Cumulative Health Records Guidelines](#).

dietary specifications: The USDA’s nutrition standards for meals for grades K-12 in the NSLP and SBP. The dietary specifications include weekly calorie ranges and limits for saturated fat and sodium. In addition, Nutrition Facts labels and manufacturer specifications must indicate zero grams of trans fat per serving for all food products and ingredients used to prepare school meals. For more information, see the CSDE’s publication, [Menu Planning Guide for School Meals for Grades K-12](#).

dietitian: See “registered dietitian” in this section.

disability: A condition in which a person has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment. For more information, see “[Definition of Disability](#)” in section 2.

Emergency Care Plan (ECP): A written plan that provides specific directions about what to do in a medical emergency such as an accidental exposure to the allergen or safety emergency such as a fire drill or lockdown. The ECP is often part of the IHCP. This written plan helps the school nurse, school personnel, and emergency responders react to an emergency in a prompt, safe, and individualized manner. For more information, see the CSDE’s publication, [Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools](#).

Family Educational Rights and Privacy Act (FERPA): A federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA allows schools to disclose student records without consent to school officials with legitimate educational interest, such as making meal modifications for special dietary needs. For more information, visit the [FERPA](#) website.

Glossary

fluid milk substitutes: Nondairy beverages (such as soy milk) that can be used as a substitute for fluid milk in the USDA’s Child Nutrition Programs. For meals and snacks to be reimbursable, these beverages must meet the USDA’s nutrition standards for milk substitutes. For more information, see “nutrition standards for milk substitutes” in this section.

food allergy: An exaggerated response by the immune system to a food that the body mistakenly identifies as being harmful. The body’s reaction to the allergy-causing food can affect the respiratory system, gastrointestinal tract, skin, and cardiovascular system. In some people, a food allergy can cause severe symptoms or even a life-threatening reaction known as anaphylaxis. For more information, see “anaphylaxis” in this section.

food components: The five food groups that comprise reimbursable meals in the NSLP (milk, fruits, vegetables, grains and meat/meat alternates) and the three food groups that comprise reimbursable breakfasts in the SBP (grains with optional meat/meat alternate substitutions, fruits with optional vegetable substitutions, and milk). For more information on the food components, visit the CSDE’s [Crediting Foods for Grades K-12 in School Nutrition Programs](#) webpage and the “Documents/Forms” section of the CSDE’s [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

food intolerance: An adverse food-induced reaction that does not involve the body’s immune system, e.g., lactose intolerance and gluten intolerance. For more information, see “lactose intolerance” and “gluten sensitivity” in this section.

food item: A specific food offered within the food components that comprise reimbursable meals in the USDA’s school nutrition programs. A food item may contain one or more food components or more than one serving of a single component. For example, an entree could provide one serving of grains and one serving of meat/meat alternates, and a bagel could provide two servings of grains.

gluten sensitivity: A condition with symptoms similar to those of celiac disease that improve when gluten is eliminated from the diet. Individuals diagnosed with gluten sensitivity do not experience the small intestine damage found in celiac disease. Gluten sensitivity is a diagnosis of exclusion that requires ruling out celiac disease and wheat/gluten allergy, followed by a period of dietary gluten exclusion to see if the patient gets better, then a gluten challenge to see how the patient reacts. For more information, see “[Gluten Sensitivity](#)” in section 2 and visit the [Celiac Disease Foundation](#) website.

has a record of such impairment: Has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities. For more information, see “[Definition of Disability](#)” in section 2.

Health Insurance Portability and Accountability Act of 1996 (HIPAA): A federal law that protects personal health information. The HIPAA Privacy Rule provides federal protections for personal health information (electronic, written, and oral) held by covered entities and gives patients an array of rights with respect to that information. It also permits the disclosure of personal health information needed for patient care and other important purposes. The Security Rule protects health information in electronic form. It requires entities covered by HIPAA to ensure that electronic protected health information is secure. For more information, visit the [U.S. Department of Health and Human Services](#) website.

Individualized Education Program (IEP): A written statement for a child with a disability that is developed, reviewed and revised in accordance with the Individuals with Disabilities Education Act (IDEA) and its implementing regulations. The IEP is the foundation of the student’s educational program. It contains the program of special education and related services to be provided to the child with a disability covered by the IDEA.

Individualized Health Care Plan (IHCP): A written document developed for children with special health care needs or whose health needs require daily intervention. The IHCP describes how to meet an individual child’s daily health and safety needs in the school setting.

Individuals with Disabilities Education Act (IDEA): A federal law ensuring services to children with disabilities that governs how states and public agencies provide early intervention, special education, and related services to eligible infants, toddlers, children, and youth with disabilities. The IDEA provides financial assistance to states in the provision of special education and related services for eligible children. For more information, visit the [IDEA](#) website.

is regarded as having an impairment: 1) has a physical or mental impairment that does not substantially limit major life activities but that is treated by a recipient as constituting such a limitation; 2) has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others towards such impairments; or 3) has none of the impairments defined in “physical and mental impairment” but is treated by a recipient as having such an impairment. For more information, see “[Definition of Disability](#)” in section 2.

lactose intolerance: A reaction to a food that does not involve the immune system. Lactose-intolerant people lack an enzyme needed to digest milk sugar (lactose). When that person eats milk products, symptoms such as gas, bloating, and abdominal pain may occur.

licensed physician: A doctor of medicine (MD) or osteopathy (DO).

local educational agency (LEA): A public board of education or other public or private nonprofit authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public or private nonprofit elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or for a combination of school districts or counties that is recognized in a state as an administrative agency for its public or private nonprofit elementary schools or secondary schools. The term also includes any other public or private nonprofit institution or agency having administrative control and direction of a public or private nonprofit elementary school or secondary school, including residential child care institutions, Bureau of Indian Affairs schools, and educational service agencies and consortia of those agencies, as well as the state educational agency in a state or territory in which the state educational agency is the sole educational agency for all public or private nonprofit schools.

major life activities: These are broadly defined and include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. “Major life activities” also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. For more information, see [“Definition of Disability”](#) in section 2.

meal patterns for school nutrition programs: The required food components and minimum servings that schools and institutions participating in the school nutrition programs must provide to receive federal reimbursement for meals and ASP snacks served to children. For more information, visit the CSDE’s webpages, [Meal Patterns for Grades K-12 in School Nutrition Programs](#), [Meal Patterns for Preschoolers in School Nutrition Programs](#), and [Afterschool Snack Program](#).

meat alternates: Foods that provide similar protein content to meat. Meat alternates include alternate protein products (APPs), cheese, eggs, cooked dry beans or peas, nuts and seeds and their butters (except for acorn, chestnut and coconut), yogurt, soy yogurt, and commercial tofu containing at least 5 grams of protein in a ¼-cup (2.2 ounces) serving. For information on crediting meat alternates, visit the CSDE’s [Crediting Foods for Grades K-12 in School Nutrition Programs](#) webpage and the “Documents/Forms” section of the CSDE’s [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

medical statement: A document that identifies the specific medical conditions and appropriate dietary modifications for children with special dietary needs. The USDA requires that the medical statement to request meal modifications must include: 1) information about the child’s physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child’s diet; 2) an explanation of what must be done to accommodate the child’s disability; and 3) if appropriate, the food or foods to be omitted and recommended alternatives. For more information, see “[Medical Statement Requirements](#)” in section 2.

menu item: Any planned main dish, vegetable, fruit, bread, grain, or milk that is part of the reimbursable meal. Menu items consist of food items.

mitigating measures: Things like medications, prosthetic devices, assistive devices, or learned behavioral or adaptive neurological modifications that an individual may use to eliminate or reduce the effects of an impairment. These measures cannot be considered when determining whether a person has a substantially limiting impairment under Section 504 or the ADA Amendments Act.

National School Lunch Program (NSLP): The USDA’s federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The NSLP provides nutritionally balanced, low-cost or free lunches to children each school day. It was established under the National School Lunch Act, signed by President Harry Truman in 1946. For more information, visit the CSDE’s [National School Lunch Program](#) webpage.

noncreditable foods: Foods and beverages that do not count toward any meal pattern components in the USDA’s Child Nutrition Programs. Noncreditable foods and beverages are either in amounts too small to credit (i.e., foods and beverage that do not provide the minimum creditable amount of a food component), or they do not fit into one of the meal pattern components. For more information, see the CSDE’s handouts, [Noncreditable Foods for Grades K-12 in the NSLP and SBP](#) and [Noncreditable Foods for Preschoolers in the NSLP, SBP, and ASP](#).

nutrient-dense foods: Foods and beverages that provide vitamins, minerals, and other substances that contribute to adequate nutrient intakes or may have positive health effects, with little or no solid fats and added sugars, refined starches, and sodium. Ideally, these foods and beverages are also in forms that retain naturally occurring components, such as dietary fiber. Examples include all vegetables, fruits, whole grains, seafood, eggs, beans, and peas, unsalted nuts and seeds, fat-free and low-fat dairy products, and lean meats and poultry (when prepared with little or no added solid fats, sugars, refined starches, and sodium). The term “nutrient dense” indicates the nutrients and other beneficial substances in a food have not been “diluted” by the addition of calories from added solid fats, sugars, or refined starches, or by the solid fats naturally present in the food.

nutrition standards for fluid milk substitutes: The USDA’s nutrition requirements for nondairy beverages (such as soy milk) substituted for fluid milk in the USDA Child Nutrition Programs. The USDA requires that any fluid milk substitutes are nutritionally equivalent to cow’s milk and contain the following nutrients based on a 1-cup serving (8 fluid ounces): 276 milligrams (mg) of calcium; 8 grams (g) of protein; 500 international units (IU) of vitamin A; 100 IU of vitamin D; 24 mg of magnesium; 222 mg of phosphorus; 349 mg of potassium; 0.44 mg of riboflavin; and 1.1 micrograms (mcg) of vitamin B-12. For more information, see table 4 in section 3 and the CSDE’s handout, [*Allowable Milk Substitutes for Children without Disabilities in the School Nutrition Programs*](#).

nutritionist: There is no accepted national definition for the title “nutritionist.” All registered dietitians are nutritionists, but not all nutritionists are registered dietitians. Some state licensure boards have enacted legislation that regulates use of the title “nutritionist” and sets specific qualifications for holding the title. The definition is variable from state to state. Section 20-206n of the Connecticut General Statutes defines a licensed dietitian/nutritionist certification for registered dietitians. Other professionals can also apply if they have successfully passed a written examination prescribed by the Commissioner of Public Health and have a master’s degree or doctoral degree from an institution of higher education accredited by a regional accrediting agency recognized by the U.S. Department of Education, with a major course of study which focused primarily on human nutrition or dietetics. For more information on state licensing requirements, visit the Connecticut State Department of Public Health’s [Dietitian/Nutritionist Certification](#) webpage.

obese (children): A body mass index (BMI) at or above the 95th percentile for children of the same age and sex. For more information, see “body mass index” in this section and visit the CDC’s [Defining Childhood Obesity](#) webpage.

offer versus serve (OVS): A concept that applies to menu planning and the determination of reimbursable school meals for grades K-12 in the NSLP and SBP. OVS is not allowed for the ASP or for preschoolers in the NSLP and SBP. OVS allows students to decline a certain number of food components or items in the meal. All required meal components must be offered to each student. In the NSLP, students must select at least ½ cup of fruits or vegetables and the full portion (minimum serving size) of at least two other components. In the SBP, students must select at least three food items including at least ½ cup of fruit (or vegetable substitutions, if offered). OVS must be implemented in senior high schools for lunch but is optional for breakfast. For junior high, middle schools and elementary schools, OVS is optional for both breakfast and lunch. OVS is not allowed for preschool meals in the NSLP or SBP, or snacks in the ASP. For more information, see the CSDE’s guide, [*Offer versus Serve Guide for School Meals*](#), and visit the CSDE’s [OVS for School Nutrition Programs](#) webpage.

overweight (children): A body mass index (BMI) at or above the 85th percentile and lower than the 95th percentile for children of the same age and sex. For more information, see “body mass index” in this section and visit the CDC’s [Defining Childhood Obesity](#) webpage.

phenylketonuria: A rare genetic disorder in which an individual lacks an enzyme to break down the amino acid phenylalanine, which is present in protein foods. Without the enzyme, levels of phenylalanine build up in the body. This can harm the central nervous system and cause brain damage.

physical or mental impairment: 1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; or 2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments; cerebral palsy; epilepsy; muscular dystrophy; multiple sclerosis; cancer; heart disease; diabetes; mental retardation; emotional illness; and drug addiction and alcoholism. For more information, see “[Definition of Disability](#)” in section 2.

Planning and Placement Team (PPT): A group of certified or licensed professionals who represent each of the teaching, administrative and pupil personnel staffs, and who participate equally in the decision-making process to 1) determine the specific educational needs of a child eligible for special education; and 2) develop an individualized educational program (IEP) for the child. These are people knowledgeable in the areas necessary to determine and review the appropriate educational program for a child eligible for special education.

product formulation statement (PFS): An information statement obtained from the manufacturer that provides specific information about how the product credits toward the USDA’s meal pattern requirements, and documents how this information is obtained citing Child Nutrition Program resources or regulations. All creditable ingredients in this statement must match a description in the USDA’s [Food Buying Guide for Child Nutrition Programs](#). Unlike a CN label, a PFS does not provide any warranty against audit claims. If these foods will be used in a reimbursable meal, the SFA must check the manufacturer’s crediting information for accuracy. For more information, see the CSDE’s handout, [Product Formulation Statements](#).

product specification sheet: Manufacturer sales literature that provides various information about the company’s products. These materials do not provide the specific crediting information that is required on a product formulation statement and cannot be used to determine a product’s contribution toward the USDA’s meal pattern components.

Glossary

reasonable modification: A change or alteration in policies, practices, and/or procedures to accommodate a disability that ensures children with disabilities have equal opportunity to participate in or benefit from a program. A request for a reasonable modification must be related to a child's disabling condition and must be in writing on a medical statement signed by a recognized medical authority.

recognized medical authority: A state-licensed health care professional who is authorized to write medical prescriptions under state law and is recognized by the State Department of Public Health. In Connecticut, recognized medical authorities include physicians (MD), physician assistants (PA) and certified physician assistants (PAC), doctors of osteopathy (DO), and advanced practice registered nurses (APRN).

registered dietitian (RD) or registered dietitian nutritionist (RDN): The Commission on Dietetic Registration defines a RD and RDN as someone who has completed a minimum of a bachelor's degree at a U.S. regionally accredited university or college and course work accredited or approved by the Accreditation Council for Education in Nutrition and Dietetics (ACEND) of the Academy of Nutrition and Dietetics (AND); completed an ACEND-accredited supervised practice program at a health-care facility, community agency, or a foodservice corporation or combined with undergraduate or graduate studies; passed a national examination administered by the Commission on Dietetic Registration (CDR); and completed continuing professional educational requirements to maintain registration. For more information, visit the AND's [What is a Registered Dietitian Nutritionist](#) website and the CDR's [Registered Dietitian \(RD\) or Registered Dietitian Nutritionist \(RDN\) Certification](#) website.

reimbursable meals: Meals and snacks that meet the USDA's meal patterns and dietary specifications for Child Nutrition Programs, and are eligible for USDA funds.

residential child care institution (RCCI): RCCIs include, but are not limited to homes for the mentally, emotionally or physically impaired, and unmarried mothers and their infants; group homes; halfway houses; orphanages; temporary shelters for abused children and for runaway children; long-term care facilities for chronically ill children; and juvenile detention centers. A long-term care facility is a hospital, skilled nursing facility, intermediate care facility, or distinct part thereof, that is intended for the care of children confined for 30 days or more.

School Breakfast Program (SBP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The SBP provides nutritionally balanced, low-cost or free breakfasts to children each school day. The program was established under the Child Nutrition Act of 1966 to ensure that all children have access to a healthy breakfast at school to promote learning readiness and healthy eating behaviors. For more information, visit the CSDE's [School Breakfast Program](#) webpage.

school food authority (SFA): The governing body that is responsible for the administration of one or more schools and has the legal authority to operate the USDA's school nutrition programs, e.g., National School Lunch Program, School Breakfast Program, Afterschool Snack Program, Special Milk Program, Fresh Fruit and Vegetable Program (FFVP), Child and Adult Care Food Program (CACFP) At-risk Supper Program implemented in schools, and Seamless Summer Option (SSO) of the NSLP.

Seamless Summer Option (SSO) of the NSLP: The USDA's federally assisted summer feeding program that combines features of the NSLP, SBP, and SFSP, and serves meals free of charge to children ages 18 and younger from low-income areas. School districts participating in the NSLP or SBP are eligible to apply to the CSDE to participate in the SSO. SSO meals follow the meal patterns of the NSLP and SBP. For more information, visit the CSDE's [Seamless Summer Option of the NSLP](#) webpage.

serving size or portion: The weight, measure, or number of pieces or slices. The minimum serving size specified in the USDA's meal patterns must be provided for meals and snacks to be reimbursable.

Special Milk Program (SMP): The USDA's federally assisted program that provides milk to children in schools and child care institutions that do not participate in other federal meal service programs. The SMP reimburses schools for the milk they serve. Schools in the NSLP or SBP may also participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs. For more information, visit the CSDE's [Special Milk Program](#) webpage.

Summer Food Service Program (SFSP): The USDA's federally assisted summer feeding program for children ages 18 and younger that provides nutritious meals when schools end for the summer. For more information, visit the CSDE's [Summer Food Service Program](#) webpage.



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